Submission by ARISO to the National Transport Commission in response to Rail Safety National Law: Consultation Regulatory Impact Analysis

11 May 2026

ARISO
AUSTRALIAN RAIL INDUSTRY STANDARDS ORGANISATION

Contents

Acknowledgement of Country

ARISO is a geographically diverse organisation. We acknowledge the Traditional Owners of Country throughout Australia. We recognise their cultures, histories and diversity and their continuing connection to the land.

Submitter and Key Contact Details

Organisation: Australian Rail Industry Standards Organisation

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Acronyms

ARA	Australasian Railway Association
ARISO	Australian Rail Industry Standards Organisation
ATA	Australian Telecommunications Alliance
CoP	Code of Practice
DITRDCA	Department of Infrastructure, Transport, Regional Development, Communications, and the Arts.
DTCT	Digital Train Control Technology
DTP	Department of Transport and Planning, VIC.
ERTMS	European Rail Traffic Management System
ETCS	European Train Control System
ITMM	Infrastructure and Transport Ministers' Meeting
ITSOC	Infrastructure and Transport Senior Officials Council
NNI	National Network for Interoperability
NRAP	National Rail Action Plan
NTC	National Transport Commission
ONRIC	Office of the National Rail Industry Coordination
ONRSR	Office of the National Rail Safety Regulator
RIM	Rail Infrastructure Manager
RISSB	Rail Industry Safety and Standards Board
RSNL	Rail Safety National Law
RSO	Rolling Stock Operator
RSSB	UK Rail Safety and Standards Board
RTO	Rail Transport Operator
SFAIRP	So far as is reasonably practicable
SMS	Safety Management System
SOE	Statement of Expectations

1. Executive Summary

Addressing historic inefficiencies and supporting a national uplift in rail requires cultural, institutional and legislative change, underpinned by high-quality national standards and a technical assurance function for the nation.

ARISO welcomes this opportunity to embed a suite of decisions made by Infrastructure and Transport Ministers Meeting (ITMM) through the National Rail Action Plan (NRAP) and the Rail Safety National Law (RSNL) Review to "strengthen the connection between safety and productivity" and recognise ARISO's role as the national standards authority[1].

As the new authority responsible for developing, assuring and enabling adoption of national rail standards and rules, ARISO's submission calls for regulatory application of a hierarchy of national mandatory and harmonised standards in Australia.

To make greater headway on productivity to benefit the rail industry and address historic market failure[2], our submission highlights the need for ARISO to be given the regulatory teeth in the RSNL and greater incentive for industry involvement in developing and migrating to high-quality national standards.

At its core, strengthening the RSNL is critical to supporting industry change towards collective network responsibility, from a history of individual decision-making that has fragmented and weakened the rail sector.

As noted in the C-RIS, additional non-regulatory reforms that are now underway including the implementation of the national standards framework will assist but will be insufficient without regulatory reform to turn around historic low-levels of harmonisation in Australia[3].

Our submission has 6 recommendations to remove major impediments for industry and remove the patchwork of variations that drive up costs and add safety risks, including:

- The RSNL be amended with a scheme for rail standards to give effect to Tier 2 harmonised standards, Tier 1 mandatory standards and a review process agreed for existing standards
- The RSNL be amended to recognise ARISO as the national standards setting authority, supported by mandatory industry membership
- To address the urgency for standardisation, use of Statements of Expectation to progress harmonised Tier 2 standards ahead of regulatory reform to ensure all organisations work together on shared challenges.

Increasing the quality and take up of rail standards is pivotal to harmonisation, increasing interoperability in the rail sector and boosting productivity and safety, which are inextricably connected.

To reflect the culture change underway in rail and the interconnectedness of safety and interoperability, ARISO believes there is merit in renaming the law to the *Rail Safety and Interoperability National Law* as an important signal to industry.

Quality standards consistently applied across the national network is now essential not only for contemporary digital train technologies relying upon standardisation but to overcome industry's long-standing pain points including slow and multiple approval processes for new fleet, costly duplication from differences across networks and higher operational and training costs which reduces workforce mobility.

[1] National Transport Commission, Rail Safety National Law C-RIS (2026), p2
[2] NTC C-RIS (2026), p15
[3] NTC C-RIS (2026), pp12-13

Our submission also highlights the need for mandatory industry participation and broad industry and government engagement in shared standards development in areas such as adopting new technology, increasing capacity and improving skills portability and sustainability. A mandatory participation model, like the UK's Rail Safety and Standards Board (RSSB) where most rail operators are required to be members as a condition of licensing with open access to standards and adoption support, would allow diverse operators to collaborate on and adhere to consistent safety, technical and operational standards which will improve efficiencies and lower costs across the network[4].

The sharing of existing standards between rail entities and ARISO through new data sharing provisions would also reduce duplication and potential retrofitting and provide a foundation for the development of future harmonised national standards.

Stronger authority as the national standard setter under the law will enable ARISO to turn around the historically voluntary approach to standards which has led to little headway in achieving harmonisation to support rail's competitiveness.

Currently, the full adoption rate of RISSB/ARISO standards is 11% and only 41 of the 198 Office of the National Rail Safety Regulator (ONRSR) accredited Rail Transport Operators[5] (RTOs) are ARISO members. Of the 53 ONRSR accredited RTOs on the National Network for Interoperability (NNI)[6] where mandatory standards will apply[7], only 22 are ARISO members[8]. These numbers fail to represent the breadth and depth of experiences of the rail industry in Australia.

Strengthening the co-regulatory approach by recognising mandatory and harmonised standards in the law and calling out the importance of ARISO's role and membership to be included as a condition of rail safety accreditation will help ensure greater industry participation in the standards development process and drive national economic uplift and productivity.

2. Productivity, safety and national standards reform

1. The RSNL Review found that the law should be amended to "strengthen the connection between safety and productivity" to deliver a safer, more interoperable and productive, digital-ready rail system, and this was agreed by ITMM in 2024.
2. In parallel, through the NRAP, ITMM approved a three-tiered National Standards Framework to drive interoperability, productivity and efficiency through agreed harmonisation of standards, rules and best practices. The Framework involves a small number of mandatory interoperability standards to prioritise what is essential for safe and interoperable rail networks (Tier 1); what is required to support national productivity and best practice (harmonised standards Tier 2); and where harmonisation can be achieved over time locally (Tier 3).
3. ITMM also agreed to five areas for harmonised national standards (Tier 2):
    - increasing the manufacturing of local rolling stock componentry
    - streamlining the infrastructure supply chain to improve efficiency
    - enhancing infrastructure to improve safety outcomes

[4] ORR (UK), 'Statutory Consultation on Changes to Licence Conditions Relating to RSSB Membership' (Consultation Outcome, 29 July 2019).
[5] ONRSR, 'National Rail Safety Register', National Rail Safety Register
[6] National Network for Interoperability | ONRSR
[7] Figure does not include Tourist and Heritage Operators as they are not required to comply with the interoperability requirements.
[8] ONRSR, 'National Rail Safety Register',

- implementing procedures to improve efficiency and safety, and
- providing training and skills accreditation requirements for repeatable tasks[9].

4. Historically there has been limited coordination in the adoption of standards, rules or best practices across Australia.

5. Research commissioned by the Australasian Railway Association (ARA), National Transport Commission (NTC), Rail Industry Safety and Standards Board (RISSB) and Office of the National Rail Industry Coordination (ONRIC) in 2025 identified a form of market failure in the rail industry due to the "opt in" nature of the voluntary standards regime at the cost of wider interoperability benefits, hampering the competitiveness of the rail sector, and called for RISSB to be "recast"[10].

6. In August 2025 ITMM agreed to a new national standards body as a critical enabler to realising national economic and societal benefits.

7. It was agreed that a "new Rail Industry Safety and Standards Board" (now ARISO) would "become the industry led technical standards setting body[11]. In effect this ITMM policy decision requires establishment of a single national standards-setting authority to develop, assure, and support adoption of national rail standards and rules that enable delivery of the policy objectives for a safer, more interoperable and productive, digital-ready rail system as an important step towards national rail reform.

8. Beyond enabling a high-level safety culture across the entire rail industry, nationally harmonised standards perform a pivotal role in enabling improved productivity. This is because the development and adoption of standards across the rail industry is how efficiency gains in the supply chain will be realised, and the basis on which an industry-wide framework for competency management and national industry-based skills development can be established.

9. To ensure clarity and certainty on accountabilities, it is essential that the technical standards authority is not conferred with a safety duty under the RSNL. Rather, rail safety duties should remain as present. Rail Transport Operators and Rail Infrastructure Managers must be the duty holders for meeting SFAIRP obligations when implementing harmonised standards.

10. There is now an urgency to harmonising strategic national standards on the National Network for Interoperability (NNI) to safely manage the interfaces between legacy and new investments in digital railways that rely on standardisation to allow multiple trains to operate safely and more productively across multiple routes.

11. To align with this national policy decision, ARISO is reforming all its processes, functions and structures to be the national standards technical authority.

12. ARISO will perform these roles in the reformed regulatory framework proposed in the C-RIS, with appropriate government and industry funding.

13. To support the policy decision by ITMM, consideration needs to be given to making provisions in the RSNL and regulations to enable ARISO to be the national industry-led standard setter and source of technical advice for the national rail system.

14. Within the reformed framework ARISO's role will be critical to the adoption of future Tier 1 mandatory standards to prepare the national network for digitisation and in driving Tier 2 harmonisation by bringing industry and governments together to develop and agree on best practice standards, rules and processes.

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[9] ITMM Communique-11-august-2025

[10] Australasian Railway Association, (23 October 2024) Harmonisation of Rail Standards Research Report

[11] ITMM Communique-11-august-2025; NTC, Historic Step Towards a Unified National Rail System (14 August 2025); NTC, Supporting a New National Approach for Rail

15. Strengthening ARISO in the RSNL will support what is a major cultural change for the rail industry to:

- Support collective innovation and the adoption of agreed best practice
- Ensure all standards are accessible and available to all the rail industry to promote wide take up
- Accelerate consistency in approach so new investments and changes to rail operations consider the interoperability impact on the national rail system
- Mitigate the risk of different principles and standards being applied in different locations leading to poor national productivity and safety outcomes
- Facilitate a reduction in the costs of designing and operating the rail system
- Avoid significant adverse long-term consequences of poor interoperability for the rail network.

16. Without regulatory support mechanisms for Tier 2 harmonised standards, the risk is on-going market failure as the rail industry will continue to default to the status quo, frustrating the opportunity to realise the benefits and deliver the productivity and safety outcomes.

17. Acknowledging ARISO's role in the RSNL will support greater consistency and productivity to help deliver on the national policy objectives.

3. Addressing the key matters in the C-RIS

18. This section responds to the proposals in the C-RIS that are most relevant to ARISO and its role in national standards development and adoption. ARISO sets out the reasons behind its six recommendations for RSNL reform.

Recommendation 1 – The RSNL be amended with a scheme for rail standards - to give legal force and effect to Tier 2 standards

19. The NTC's proposal for a specific provision to be included by amendments to the RSNL to support and better facilitate nationally harmonised Tier 2 standards and network rules through a "Code of Practice like approach" is supported; and

20. Provisions should be made in the RSNL and its regulations to explicitly give legal force to the Tier 2 standards developed and approved by ARISO; and

21. That as part of but not in place of accredited rail operators demonstrating they are meeting their safety duties SFAIRP, the Tier 2 standards should be identified in the amendments to the RSNL as being admissible in court proceedings as either:

i) prima facie evidence (preferred); or

ii) evidence;

of whether or not a duty or obligation under the RSNL has been complied with; and

22. The NTC consider the need for the approval steps required by current section 249 of the RSNL, particularly with a view to:

i) affirming the appropriateness of ARISO's standards development framework and ARISO approval of standards as being sufficient to give legal force to the Tier 2 standards; and

ii) analysing the appropriateness of retaining the current requirements for approval of draft technical rail standards by ITMM and ONRSR.

Analysis and reasons for recommendation 1

23. The NTC's approach is broadly supported for the reasons stated in the C-RIS that Ministers have approved ARISO to be the industry-led technical standards body, and provision for this in the RSNL would support the adoption of harmonised standards and network rules.

24. The lack of effective interoperability and harmonisation between Australia's connected but separately managed rail systems has been a long-standing challenge for the efficient operation of Australia's national rail system. Notwithstanding the first round of reforms to establish the RSNL, and the establishment of RISSB around the same time, very little headway has been made in harmonising and adopting standards and rules nationally across the rail industry.

25. Throughout its history, RISSB, ARISO's predecessor, has operated in an environment where membership and adoption of the standards it developed was voluntary and viewed as "lowest common denominator". With limited authority and resourcing the adoption rate of voluntary national standards is ineffectual, at around 11%. A more purposeful approach through the law with appropriate resourcing for a quality standards development process is necessary to harmonise priority national standards and rules, overcoming the "opt in" approach that hampers consistent best practice.

26. The key point is that a set of regulatory mechanisms are needed that provide incentive for industry to continue to meet their safety obligations SFAIRP, whilst participating in the developing and migrating to harmonised national standards that deliver improved interoperability and productivity.

The evidentiary weight of standards

27. Appropriate evidentiary weight needs to be given to Tier 2 standards developed by ARISO. A case exists to provide in the RSNL that adherence to the standards should safely constitute "prima facie evidence" of compliance rather than simply "evidence".

28. Recognition of Tier 2 standards as proposed would not be separate to or in place of current requirements of accreditation that rail transport operators have an appropriate SMS in place. Operators would need to demonstrate how they meet their safety duties when adopting Tier 2 standards in their operations.

29. ARISO considers that enhancing the evidentiary status of Tier 2 standards is justified under a strengthened standards development process. An evidentiary presumption that would have the effect of making standards a safe harbour on which industry can place greater reliance given a clear, unambiguous definition at law (if dealt with in this manner) thereby encouraging additional take up by industry and generating greater interoperability and productivity throughout the rail sector.

Improving the standards approval and assurance process

30. In August 2025 ITMM agreed to a new RISSB to become the industry led technical standards setting body. This policy decision recognised the importance of a single national standards-setting authority to improve how standards are developed, assured, and adopted to drive interoperability and productivity and support a digital-ready rail system[12].

31. The former RISSB/now ARISO has made significant progress to become the national technical authority through the appointment of an expert board and constitutional change and implementation of a standards development framework aligned to national priorities. All processes, functions, structures and work program are being redesigned so ARISO can perform the standards setting roles required by the rail industry.

[12] ITMM Communique-11-august-2025; Supporting a New National Approach for Rail.

32. This is a step-change in ARISO's capability and assurance model, with a new end-to-end standards development process being implemented, beginning with an expert-led draft of a standard, with leadership to engage industry iteratively, apply tiered technical assurance governance so regulators and industry can rely on our work, accompanied by technical assurance and implementation plans.

33. This is a rigorous rebuild of ARISO's processes to reflect the national standard framework priorities. Tiered technical assurance governance arrangements will include a standards assurance group comprised of senior technical engineers and decision-makers from across industry and government to be a key technical assurance and decision-making forum for interrogating product integrity and associated assurance to evaluate and recommend the release of standards to the ARISO board.

34. To ensure clarity and certainty on accountabilities, it is essential that the technical standards authority is not conferred with a safety duty under the RSNL. Rather, rail safety duties should remain as present. In particular Rail Transport Operators and Rail Infrastructure Managers must be the duty holders for meeting SFAIRP obligations when implementing harmonised standards.

Current RSNL Code approval and publication requirements

35. A code type mechanism could work effectively in making Tier 2 standards persuasive to industry to adopt. The NTC position in the C-RIS is supported:

    "While it is open to the regulator and courts under existing law to refer to ARISO standards as evidence of industry practice, this amendment would go further by formally incorporating references into the law for how Tier 2 standards can be used as evidence in determining whether duties have been fulfilled.

    This would not make harmonised standards mandatory, as alternative pathways for compliance would remain available. However, these practices have the benefit of clearer expectations as to what operators need to do to satisfy legislative duties and may promote the uptake of the harmonised standards as the standard of best practice".

36. This mechanism would support enhanced interoperability and productivity in the rail industry, with greater industry incentive to harmonise best practice nationally.

37. A key advantage of the code type approach is that it draws on existing code of practice provisions in the RSNL which have their origins in English health and safety laws and later, Australian occupational health and safety laws. The codes of practice essentially enable practical guidance to be provided about how persons in affected industries might discharge the general safety duties and are already well used throughout Australia including in the rail industry and other transport sectors.

38. The provisions do not make codes mandatory. Instead, the provisions give the codes an evidentiary status in law. The codes become evidence of ways that the general safety duties *might* be discharged or met by industry participants.

39. While codes do not provide complete compliance assurance that general safety duties have been met, they are very useful to industry participants as a safe harbour, sometimes persuasive in dealings with the regulator and useful in assisting defences to prosecutions.

40. However, the current process for approval of Codes of Practice (CoP) also requires careful review to achieve safety and productivity outcomes. The process is structured iteratively to ensure rigorous technical validation and independent review. It is also very slow and, if applied to technical standards, the burden will be more acute.

41. NTC should take the opportunity provided by the RSNL C-RIS/D-RIS process to streamline the approach through a scheme for standards that differs from the current requirements of section 249 of the RSNL which requires codes to be:

    - approved by Ministers – that is, unanimously approved by ITMM ministers

- formally published on the NSW legislation website and published by ONRSR on its website.

42. In practice, the steps required by section 249 contain significant additional process requirements. As well as the process steps that ARISO itself applies, the section 249 code approval steps effectively requires:

    - consultation with representatives of all Australian governments and their ministers, departments and agencies and subsequent approval by Ministers; and
    - final approval of the CoP by ONRSR before publication.

43. An alternative is a stronger co-regulatory process to prioritise future mandatory and harmonised standards, which was jointly developed with RISSB, the NTC, jurisdictions and the Regulator to inform ITMM's decision on new rail governance. This robust process for future standards development is set out in Figures **1** and **2**.

44. Under this co-regulatory model, ARISO does not advise on compliance, but it provides a technical advisory function to the rail industry and is a single point of technical advice on complex technical areas to support consistent implementation. This is a centralised national technical authority function that could be further supported with an obligation on jurisdictions and RIMs to provide ARISO with access to existing standards to guide future reform opportunities.

45. A shared national standards library managed by ARISO would give visibility to drive harmonisation and avoid the risk of duplicating standards development efforts in cases where existing standards could provide a strong foundation.

46. ARISO should manage a national library of standards and provide industry with advice and implementation support.

Figure 1: Process: Tier 1 mandatory standards

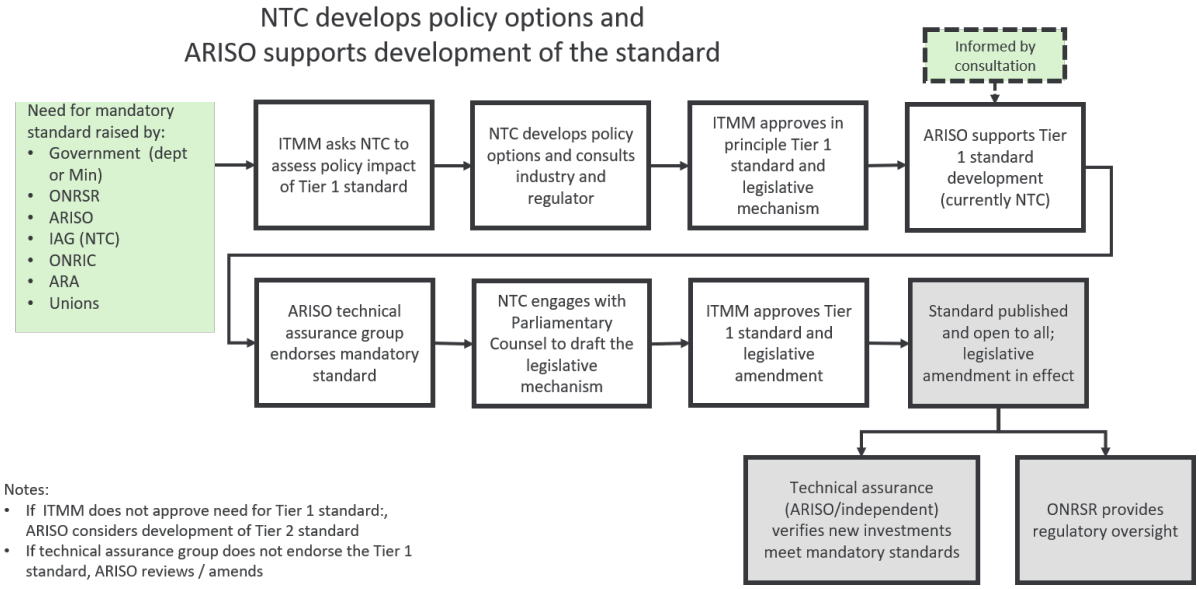
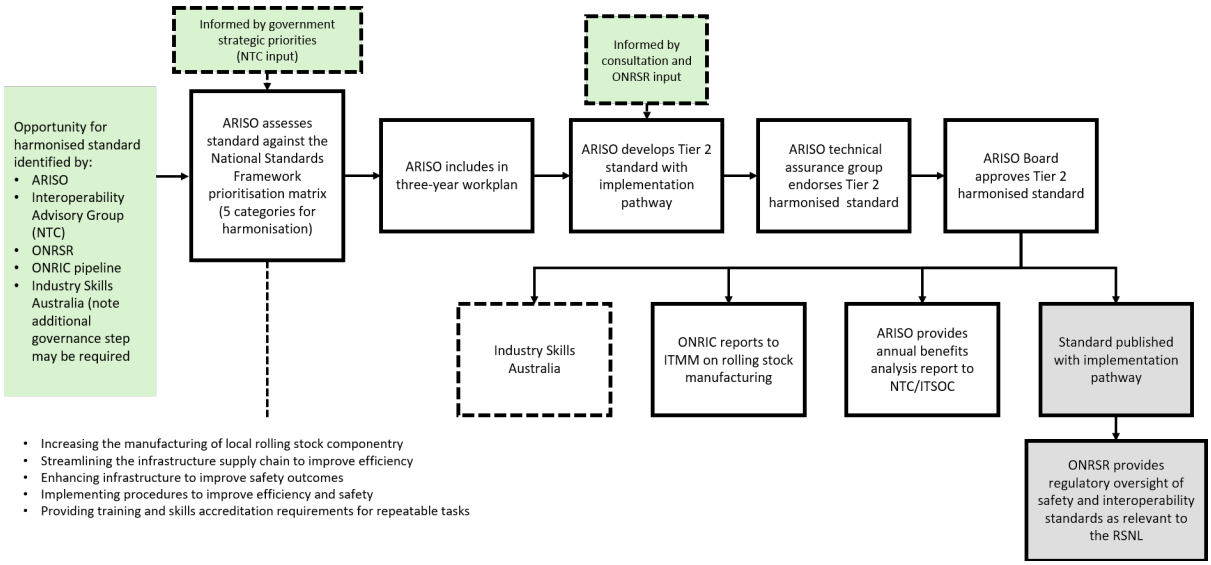


Figure 2: Process: Tier 2 harmonised standard



47. Future ARISO standards will be aligned to national priorities and the standards prioritisation framework approved by ITMM. A new function will be established around supporting industry to adopt international and national standards to drive harmonisation and strategic analysis of benefits realisation and productivity improvements.

48. The provisions of Section 249 of the RSNL requiring consultation with all Australian governments and subsequent unanimous approval by ITMM are therefore a duplication of the national standards reforms underway and unnecessary.

49. Having defined the role of ARISO as the national standards technical authority with strengthened governance, supported by a national prioritisation framework, and independent review and assurance through expert governance, the technical standard itself should not require further ITMM review. Indeed, a provision for ITTM to review and seek amendments to a technical standard may work against the objects of RSNL.

Recommendation 2 - The RSNL be amended with a scheme for rail standards - to give legal force and effect to mandatory Tier 1 standards

50. Of the options proposed by NTC in the RSNL C-RIS to give effect to mandatory rail standards, it is recommended that amendments to the RSNL be developed through the national policy and legislative processes that:

    i) confer appropriate legal support for mandatory rail standards in the RSNL; and

    ii) provides for an efficient and effective mandatory standards development process that incorporates an approval process in the RSNL that is sufficiently proportionate and efficient and not excessively burdensome; and that

    iii) ensures that the ITMM decision that ARISO becomes “the industry led technical standards setting body” which necessarily includes supporting the development of future mandatory standards is reflected in the amendments to the RSNL.

Connection to the C-RIS

51. ARISO’s recommendation 2 addresses NTC’s proposals in relation to the application of mandatory rail standards, in particular the proposals directed to RSNL review recommendation 2 set out in table 5 on page 28 of the C-RIS relating to possible provisions to be added to the RSNL mandating requirements to achieved specified

interoperability outcomes (contained under the heading “interoperability options”). ARISO’s reasons for its recommendation are set out below.

Analysis and reasons for recommendation 2

52. It is essential that appropriate mechanisms for making and giving legal effect to mandatory rail standards be established in primary legislation, the RSNL.

53. There needs to be a clear, effective and proportionate legislative (and regulatory) mechanism that supports the status and enforceability of mandatory Tier 1 standards and provides the regulatory basis that fosters industry-wide adoption of nationally harmonised Tier 2 standards once they are approved.

54. NTC’s proposal that ARISO will provide RTO’s with support in the form of technical guidance on consistent application of mandatory standards is supported as an essential new function to drive adoption of best practice.

Recommendation 3 - A review process be agreed for existing standards to elevate their quality and standing to meet Tier 2 requirements

55. ARISO and its predecessor RISSB have developed a suite of Australian rail industry standards that are accredited by Standards Australia, including the first initial prioritised tranche of harmonised standards identified under the NRAP[13].

56. The C-RIS does not address the question of status for existing standards. ARISO recommends that:

    a) the NTC clarify the status of the existing library of standards, and

    b) consider an appropriate review process for existing standards to elevate their quality and standing to meet Tier 2 requirements under the new RSNL.

Connection to the C-RIS

57. ARISO’s recommendation 3 addresses the NTC’s proposals in relation to the adoption, application and treatment of rail standards generally to meet the overarching national policy objectives of improving rail interoperability and productivity . Refer to pages 28 and 36-38 of the C-RIS.

Analysis and reasons for recommendation 3

58. The future standing of previously approved Australian rail standards, rules and codes require a robust review process. With a step-change in ARISO’s standards development and assurance process to reflect the decision-mapping in Figure 1 and Figure 2, existing standards, codes and rules are likely to require an uplift to be relied upon by industry, governments and regulators.

59. The assurance process should determine whether an existing standard or code can be elevated in quality and standing to meet Tier 2 requirements. ARISO is reviewing its entire product library to apply the three-tiered standards framework model with a must do/should do/can do logic, as a first step towards preserving valuable content and meeting Tier 2 requirements. This includes the first tranche of national harmonised standards developed for the NRAP that was approved by ITMM to support rolling stock harmonisation and a registration system[14].

[13] NTC, Supporting a New National Approach for Rail; ARISO Work Plan 2025–2026

[14] NTC progress report to ITMM on the National Rail Action Plan, October 2023

Recommendation 4 - The RSNL be amended to recognise ARISO as the national standards setting authority

60. The designated role for ARISO as the industry-led technical standards setting body in the rail sector needs to be recognised in the RSNL under its own specific provisions. It is recommended that:

    a) the RSNL is amended to identify ARISO as the national standards setting entity under the RSNL for supporting and developing future Tier 1 and Tier 2 standards;

    b) that authority for ARISO to be the industry-led technical standards setting body be explicitly stated by either naming the entity in the RSNL or through a legislative mechanism in the RSNL. Similar provision exists in the *Telecommunications Act 1979* (Cth) for the telecommunications industry that enables the standards setting body to be identified in a separate legislative instrument to ; and

    c) that the RSNL be amended to include a mechanism for mandatory membership by all accredited Rail Transport Operators to ensure all industry operators and contractors are involved in developing and sharing best practice standards and drive harmonisation.

Analysis and reasons for recommendation 4

ARISO should be recognised in the RSNL

61. The persistent rail industry market failure to develop and implement harmonised standards stems from a fundamental governance gap: there is no authorised standards organisation for the national rail network. In its absence, rail standards have fractured across jurisdictions and networks, entrenching inefficiency, inflating costs, and stifling innovation. Operators and the workforce are forced to navigate a patchwork of competing technical standards, performance requirements, access conditions, and rule books – raising barriers for new entrants and undermining productivity for established freight and passenger services and the workforce. This fragmentation not only erodes interoperability across the national network, but also constrains the industry's ability to modernise, decarbonise, and adopt new technologies. A national standards body is necessary to deliver system-wide benefits that are economic (productivity, cost reduction, manufacturing) and societal (safety, workforce mobility, connectivity). Establishing the authority of ARISO to develop harmonised, nationally consistent standards is therefore critical to unlocking a safer, more efficient, and more innovative rail system.

62. There is only one reference to RISSB which occurs in Part 2, Division 1 section 13(1)(f) of the RSNL. The reference is oblique and whilst introducing the concept of a prescribed authority it does not make any statement of its role, or the authority that is conferred on it by RSNL.

63. There is no other reference to RISSB or ARISO in the RSNL. Comparatively, in other industry sectors there is a statutory mechanism that identifies the standard setting entities in regulatory schemes governed by legislation. This precedent provides useful guidance as to what could be reasonably said to be the minimum necessary to provide sufficient authority to the organisation required to perform the standards-setting role.

64. The national policy objectives to maximise the productivity and societal benefits of public investments in rail are underpinned by a quality standards regime. ARISO has been nominated by ITMM to play this role. Recognising ARISO in the RSNL will support greater industry involvement in the development and implementation of national standards to strengthen co-regulation and to deliver the critical policy benefits that ITMM seeks. It will also support ARISO as Australia's representative on key global rail standards forums to share international experience with the local industry.

65. Given the above considerations, ARISO seeks amendments to the RSNL to name ARISO and detail its enhanced role as the national standards authority in Australia.

A relevant national case study – the Australian telecommunications sector

The telecommunications co-regulatory model in Australia is relevant to the development of the current reforms affecting standards in the rail industry because of the similarities in industry structures and the need to establish a framework that enables interoperability across multiple networks. A full case study is attached in Attachment 1 to show how demarcation of standards development and a set of "at minimum" provisions have been used to achieve overarching national policy goals.

Membership of ARISO

66. The C-RIS raises the option of membership of ARISO to be included as a condition of rail safety accreditation to open access to standards and to drive timely adoption of Tier 2 best practice standards.

67. The need for open industry access to all ARISO products and much stronger industry involvement in the development of future Tier 1 and Tier 2 standards is supported.

68. A tiered membership model framed around the National Standards Framework would ensure the broadest industry involvement in Tier 1 and Tier 2 development, assurance and adoption.

69. Global experience shows that implementing ETCS and transitioning to interoperable rail networks creates deep and far-reaching interdependencies across the entire rail industry, extending well beyond organisations that supply, install, operate, or maintain signalling and train control systems. The development of mandatory performance and technical best practice standards and codes of practice will have wide-ranging consequences for all industry participants, requiring meaningful industry involvement.

70. The current voluntary membership model of ARISO has led to a 'lowest common denominator' approach that is not fit for purpose for contemporary railways.

71. Only 41 of the 198 ONRSR accredited RTOs are ARISO members. Of the 53 ONRSR RTOs accredited to operate on the NNI where mandatory standards will apply[15], only 22 are currently ARISO members. This puts greater onus on some RIMs and is failing to reflect the breadth of experiences of the rail industry in Australia, from tourism and heritage operators to train crew, manufacturers, transport agencies, consultants and unions. Strengthening the co-regulatory approach by recognising mandatory and harmonised standards in the law and supporting a broader membership base for ARISO to drive adoption would underwrite the principle of industry participation in the standards development process, provide for participation of all potentially affected parties in the standards development process and ultimately lead to better productivity and safety outcomes.

72. The importance of broad industry membership to resolve system-level coordination problems inherent in railways is evidenced in the UK and Europe. Broad or quasi-mandatory membership models in the UK and Europe have been beneficial because they address the systemic and interdependent nature of rail operations, where safety, efficiency, and interoperability cannot be achieved by individual firms acting alone. By ensuring whole-of-industry participation, these models overcome coordination failure, enable consistent standards adoption, and support shared risk management, resulting in improved safety outcomes, lower costs, and more efficient and interoperable rail networks[16].

[15] *Op.cit*, ONRSR

[16] European Union Agency for Railways, 'Interoperability'; Rail Safety and Standards Board (UK), 'Harmonised Rail'

73. Mandatory membership of centralised standards bodies has enabled shared data and incident learning, consistent safety methodologies, system-wide risk reduction, and economic efficiency through seamless train movements across borders (see case study below).

74. Given the above considerations, there is a sound policy case for reform in this area, through amendments to the RSNL. Broader, mandatory membership will help standards development and assist Australia to improve rail industry standards and their take up more rapidly.

75. While consideration of any competition policy and other impacts on industry through membership levies needs to be carefully considered through the C-RIS-/D-RIS process, the lessons from Europe and the UK is that mandatory or quasi-mandatory membership of a national standards body through licensing conditions is critical for creating a "one system approach", supporting industry-led innovation and for supporting uniform standardisation which improves efficiencies, reduces confusion and manages risks.

A relevant international case study – UK membership model

One of the prime policy justifications for the "quasi-mandatory" membership model in the UK rests on the principle of collective responsibility for system-wide safety. Quasi-mandatory refers to a structure where adherence is technically voluntary but essential to operate, as it is driven by license conditions and safety regulations. Existing statutory requirements in the UK and support for the rail industry standards body in the UK – the Rail Safety and Standards Board (RSSB) is instructive for the mechanism to achieve a broad industry member base that is owned by and serves Britain's rail industry. RSSB's safety, standards, and research work in the UK is overseen by the Office of Rail and Road (ORR), an independent government entity that regulates rail safety and other non-safety matters including those relating to competition, commercial and consumer protection requirements. A short overview about the development of rail industry standards in the UK and the mandatory membership model that drives engagement of accredited rail operators is set out in **Attachment 2**

A relevant local case study – Public Transport Ombudsman (PTO) Victoria

The PTO is a public company limited by guarantee and is an independent industry-member organisation that provides dispute resolution services, paid for by the public transport organisations that are required to be members of the scheme. PTO scheme members include passenger train, tram and bus companies, and others involved in providing public transport services, such as Public Transport Victoria and Southern Cross Station. Membership provides PTO scheme members with an independent escalation point for complex or hard-to-resolve complaints raised by customers or community members.

The Ombudsman scheme, established in 2004 to receive, investigate and resolve complaints about public transport services provided by Victorian public transport operators, is funded by the industry, based on an annual fixed membership fee and on a variable user-pays basis, calculated on annual complaint numbers. This means organisations that generate more PTO workload (more escalated complaints) pay more.

Other examples of industry models in Australian standards and assurance bodies is provided in **Attachment 2.**

Recommendation 5 – That Statements of Expectation require ONRSR to consider nationally harmonised Tier 2 standards and refer to them in regulatory activities and guidance

76. There are existing legislative and executive powers, including in the RSNL, to immediately enable Ministerial Statement of Expectations (SOE) to be issued directing (or requesting) the Regulator ONRSR to consider safety across the whole rail network, or designated parts of the network.

77. A direction or request that requires ONRSR to consider nationally harmonised Tier 2 standards and to refer to them in regulatory activities and guidance is supported.

78. To ensure there is no further delay to harmonisation efforts, legislative reforms to the RSNL should include appropriate provisions to ensure that ONRSR gives appropriate support to the initiation, approval, adoption and application of nationally harmonised rail standards.

79. An outline of proposals relating to Statements of Expectation (SOE) in respect of RSNL Review [footnote: recommendation 1 is set out in Table 5 on page 27 of the C-RIS]. This option is described as a non-regulatory or collaborative approach. It is explained as follows:

> "Introduction of a ministerial statement directing the Regulator to consider safety across the whole network - include harmonisation as consideration to reduce differences and thereby improve productivity
>
> This could be achieved by ministers issuing a Statement of Expectations to the Regulator, requiring the Regulator to consider nationally harmonised tier 2 standards and refer to them in regulatory activities and guidance".

80. In the same area of the C-RIS, the NTC outlines a stronger proposal for legislative change involving making amendments to the RSNL to highlight productivity or efficiency as a key principle.

Analysis and reasons for recommendation 5

81. The first approach suggested by NTC is presented in the C-RIS as a "non-regulatory or collaborative approach".

82. The concept of using an SOE approach is supported but is not sufficient on its own to drive effective uptake of national standards.

83. To ensure the momentum for change in the rail industry is not lost through lengthy regulatory reform processes, the use of SOEs is supported as a cooperative interim measure that will support industry change. A SOE would be insufficient alone to drive improved industry adoption of standards and therefore it would be insufficient in isolation to contribute to enhanced interoperability and productivity.

84. The SOE option should complement compelling measures to reinforce regulators' responsibilities and clarify existing statutory obligations.

85. ARISO believes that it is appropriate to view the options 1 and 3 listed by NTC in respect of RSNL Review recommendation 1 in Table 5 of the C-RIS as complementary measures rather than alternatives. Accordingly, ARISO recommends that both options be pursued in tandem.

Recommendation 6 - Other necessary reforms be reflected in amendments to the RSNL to support standards

86. ARISO recommends that amendments be pursued throughout the RSNL to recognise interoperability and safety as interconnected policy imperatives with clear legislative status in the national law.

87. Renaming the RSNL the *Rail Safety and Interoperability National Law* be considered to emphasise the importance of the National Cabinet priority and deliver on the ITMM decision to strengthen interoperability and productivity in the law. Noting, this has been the approach in the UK and the European Union[17], where interoperability policy outcomes are pursued through general safety duties because there is strong evidence that interoperability and safety are intertwined in delivering a seamless, safer, more efficient, and more sustainable rail system.

88. ARISO supports NTC's proposals for specific legislative changes to support productivity and interoperability, including a general duty be added in relation to interoperability, and that:

    i) consideration be given to amending the RSNL to change the title of the law from the *Rail Safety National Law* to the *Rail Safety and Interoperability National Law*:

    ii) that the main purpose of the RSNL in section 3(1) be changed from, "The main purpose of this Law is to provide for safe railway operations in Australia", to "The main purposes of this Law are to provide for safe railway operations and for the control of measures to enhance industry productivity in Australia".

    iii) that the statutory objects of the RSNL (section 3) be improved and reformed to include along the following lines that:

        "The objects of this Law are -

        to promote and support the development, approval, adoption and application of harmonised rail safety standards to assist improved rail system productivity and improved interoperability in the rail industry"

        and;

    iv) that the functions of ONRSR (section 13) be appropriately amended and include words along the following lines:

        "In addition to any other function conferred on ONRSR by this Law or an Act, ONRSR has the following functions –

        to work with and assist the designated rail standards entity (ARISO), rail transport operators and other relevant persons involved in or connected with railways to support the development, approval, adoption and application of harmonised rail safety standards".

Connection to the C-RIS

89. ARISO's recommendation 6 addresses the C-RIS generally in relation to the key national themes of interoperability, productivity, uniformity or consistency of rail sector standards and institutional governance that are repeated heavily throughout the document. Maximising the benefits of these matters is a major factor that will determine the success of the rail industry reform program.

90. ARISO's recommendations touch on several specific proposals in the NTC C-RIS. These include:

- Table 5, RSNL Review recommendation 1
- Table 5, RSNL Review recommendation 2
- Table 5, RSNL recommendation 16 (Note: ARISO supports the proposal that the RSNL be amended to highlight interoperability as a key object and guiding principle which has equal weighting with safety)

[17] EU Directive, 2016/797, arts 4-5; Railways (Interoperability) Regulations 2011; Health and Safety at Work etc. Act 1974.

Analysis and reasons for recommendation 6

91. The legacy of separate state systems and the resulting fragmentation of standards impedes the economic uplift out of rail investments and adds to the costly differences and delays across the rail system. It also complicates inter-jurisdictional operations and limits workforce mobility.

92. ARISO considers that the C-RIS process provides unique opportunities that should not be missed to promote rail standards, interoperability and productivity generally, improve processes and better support the overall efficiency, status and operation of the entity that develops standards.

93. There is a clear policy case for pursuing these opportunities. ITMM is unambiguously signalling to the sector that it wants the rail industry and governments to pursue improved interoperability and productivity in the rail industry without compromising safety. Ministers have also made it clear that standards and the national standards development agency, ARISO, are key components in the success of those policy objectives.

94. It is notable that the NTC C-RIS contains several proposals to amend the RSNL to highlight or promote the relatively recently determined policy objectives such as, "…improve productivity through approving rail interoperability and/or harmonising safety across networks". ARISO supports these suggestions made by NTC.

A general duty relating to interoperability

95. The proposal to introduce a duty on RTO's to manage interoperability requirements, either by modifying an existing general duty or introducing a new general duty, is supported. A duty in this area will be more efficient and effective than relying solely on prescriptive legislation.

96. General duties are considered superior to prescriptive regulation in numbers of areas of government regulation of industries and activities. In modern legislative design, general safety duties (often referred to as performance-based or principles -based regulation) are increasingly preferred over prescriptive and detailed regulatory requirements as they focus on outcomes rather than specific obligations.

4. Conclusion

97. Rail is ready for the next wave of regulatory reform, with interoperable and harmonisation standards to be driven through a new and strengthened rail standards authority, supported by stronger provisions in the RSNL. A new cooperative era of governments and industry working together to achieve a productivity uplift for the nation is required.

98. ARISO thanks the NTC and other stakeholders for their collective work to date in progressing these important national reforms canvassed in the C-RIS. ARISO supports many of the proposals contained in the C-RIS to drive industry change.

99. Our recommendations are targeted carefully at advancing the key national interoperability and productivity policy objectives, noting that safety is only achieved when systems are safe to operate together. Consideration of their adoption will materially assist the national policy goals for rail reform.

Attachment 1: Rail Industry Standards in the Telecommunications Industry

The telecommunications industry operates under a regulatory model characterised by co-regulation where industry-developed codes are underpinned by legislation enforced by government. It is useful to briefly examine the settings in this industry for pointers as to how the rail sector should approach the issue of recognition of the standards setting body.

- The telecommunications sector has two key regulators -
    - the Australian Communications and Media Authority (ACMA) which oversees technical regulation, consumer safeguards, licensing, and spectrum management under the *Telecommunications Act 1997*. Its role also includes enforcing standards.
    - the Australian Competition and Consumer Commission (ACCC) which is responsible for economic regulation of the sector, including competition matters and access to essential infrastructure such as the National Broadband Network.
- Some key features of the regulatory framework for the communications sector are -
    - the prime applicable laws in the sector are the *Telecommunications Act 1997* and the *Telecommunications (Consumer Protection and Service Standards) Act 1999*.
    - the sector operates under a co-regulatory framework. The Australian Telecommunications Alliance (ATA) (formerly the Communications Alliance) develops industry codes of practice which ACMA applies if it finds them sufficient.
- Telecommunications standards in the sector are established using the co-regulation model where the regulator and relevant industry bodies work together. The demarcation of responsibility for standards is -
    - the Australian Communications and Media Authority (ACMA) has power to make technical standards and register industry codes.
    - the Australian Telecommunications Alliance (ATA): is the peak industry body in the sector and an accredited Standards Development Organisation. The ATA develops most technical standards (for example, for customer equipment and cabling) and consumer codes (for example, the Telecommunications Consumer Protections Code).
    - Standards Australia is an accredited body that develops standards for things relating to telecommunications including structured cabling, equipment safety, and electromagnetic compatibility.
- Relevant telecommunications standards generally follow a sequence of industry-led development followed by government approval. The sequence is typically as follows:
    - Industry Development: under a Memorandum of Understanding with the ACMA, the Australian Telecommunications Alliance typically takes the lead in drafting technical standards. Working committees comprising industry experts, consumer representatives, and government observers collaborate to create these documents.
    - ACMA Adoption: once a standard is developed, the ACMA may "call it up" by referencing it in a legislative instrument. This gives the standard legal force, thereby making compliance mandatory for manufacturers, importers, and service providers.
    - Code-to-Standard Escalation: if the industry fails to develop an effective voluntary code, or if a code is found to be deficient, ACMA has the power to intervene and determine a mandatory industry standard itself.
    - Compliance Framework: standards are often given regulatory weight through instruments like the *Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument 2025*, which requires products to meet specific technical benchmarks before they can be sold.
- ACMA describes its role in respect of industry standards as follows:

"Codes and standards exist to protect consumers and help telcos operate. Our role is to ensure the telco industry follows the rules.

Industry bodies develop codes and submit them to us. Once we approve them, we include them in the register.

The purpose of the codes and standards is to promote:

- the long-term interests of those who use of telecommunications services
- the efficiency and international competitiveness of the Australian telecommunications industry
- the ability of the industry to regulate their work

The telecommunications industry can develop new codes or vary existing codes on any telecommunications matter.

If we decide a new code is necessary, we may ask a group that represents industry to develop one. If they don't develop a code or it doesn't meet our criteria, we may develop an industry standard instead. Industry must then meet the standard." (ACMA website, accessed 20/1/26).

Legislative authority relating to the Australian Telecommunications Alliance (ATA)

- The ATA is understood to be recognised by ACMA under Part 6 of the *Telecommunications Act* (which concerns development of industry codes and industry standards) as a body responsible for the development of industry codes.
- Provisions like section 117 of the *Telecommunications Act* can and are used to give recognition to the ATA and the codes and standards they develop.
- Section 117 is relevant in respect of the authority given to industry participants to develop codes. That section effectively provides the platform to enable industry participants such as the ATA to have codes registered by the ACMA if certain preconditions are met.
- In the first instance, the provision applies if the ACMA:
  - "…is satisfied that a body or association represents a particular section of the telecommunications industry; and" the
  - "…body or association develops an industry code that applies to participants in that section of the industry and deals with one or more matters relating to the telecommunications activities… of those participants".
- Part 21 of the Telecommunications Act relates to technical standards. The part gives authority to the ACMA to make certain nominated customer service standards.
- The Part also enables adoption of voluntary technical telecommunications standards that the ACMA may apply, adopt or incorporate any matter contained in a standard proposed or approved by other entities including Standards Australia or "…any other body or association". (section 377).
- The next section, section 378, enables ACMA to permit, " …a body or association approved in writing by Standards Australia…" to prepare draft technicals standards and conduct consultations on the drafts.
- Importantly, the ATA is an "approved body" for the purposes of section 378 of the Act and it therefore has a recognised status under the legislation and under the regulatory scheme.
- The ATA website states that, "The ATA is also recognised under Part 21 of the Telecommunications Act 1997 as an approved Standards Development Organisation (SDO) accredited by Standards Australia to make technical standards."

Relevance of the telecommunications model in Australia for ARISO and the rail sector

- The telecommunications regulatory model in Australia is relevant to the development of the current reforms affecting standards in the rail industry because of the similarities in industry structures and the need to establish a framework that enables interoperability across multiple networks.
- The regulatory models in the industries share important similarities. For example, the models in each industry reflect strong features of co-regulation where aspects of the regulation involve non-government industry bodies across the breadth of the telecommunications industry developing standards that industry must observe or have strong incentives to observe. Likewise, both the rail and telecommunications standards bodies are accredited by Standards Australia.
- The telecommunications regulatory model is effective in providing for the recognition of the primary codes and standards effectively set by industry.
- The *Telecommunications Act* provides a flexible mechanism for the ATA and other industry entities to be identified as an "approved body", i.e. an entity that may develop codes and standards that can be adopted and enforced by the regulator.
- The clear direction of Ministers and jurisdictions in the rail sector is highly relevant here. The ITMM communique in August 2025 stated, in the context of generating improved productivity and interoperability, that:

  > "*Ministers also agreed a new Rail Industry Safety and Standards Board will become the industry led technical standards setting body."*

- A key element present in the telecommunications model is a set of "at minimum" provisions that is currently missing in the RSNL.
- Enhanced development, approval and adoption of harmonised rail standards is a critically important component of the key overarching policy objectives of improved rail system interoperability and improved rail industry productivity.

Attachment 2: Industry membership models

Rail Industry Standards in the UK and Membership of RSSB

Summary

- Rail industry standards in the United Kingdom are managed by the Rail Safety and Standards Board (RSSB) under a collaborative, industry-led framework that is overseen by the Office of Rail and Road (ORR).
- While the RSSB is an independent non-profit entity, its authority is supported by the *Railways Act 1993*. The Act enables the ORR to mandate RSSB membership and standards compliance as a legal condition of a railway operator's licence. This system seeks to ensure that all railway assets—from infrastructure to rolling stock—meet rigorous standards requirements for safety and interoperability that are set by industry experts.
- The standards framework has various tiers. These range from mandatory Railway Group Standards (RGS) to non-binding guidance. All of the standards align with key safety legislation like the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS).
- To fund these standards activities, RSSB member operators must pay a non-uniform annual levy based on their size and turnover.
- While compliance with membership and fees is mandatory, a formal derogation process exists that permits safe technical departures from standards when full compliance is not reasonably practicable.
- Failure to comply with the rail standards or pay the mandatory membership levy can result in formal enforcement action by the ORR. Because these requirements are specific conditions of an operator's licence under the *Railways Act*, the ORR can issue prevention or enforcement orders, impose significant financial penalties, or, in extreme cases of persistent non-compliance, revoke the operator's licence entirely. Revocation effectively bars the entity from operating on the UK rail network.
- Greater detail on this scheme is set out below.

1. How Rail Industry Standards are Developed in the UK

- Rail industry standards in the UK are developed through a collaborative, industry-led process managed by the Rail Safety and Standards Board (RSSB).
- RSSB operates under an overarching framework approved by the Office of Rail and Road (ORR), the UK's independent safety and economic regulator.
- The ORR enforces health and safety laws, monitors rail performance, and seeks to protect the interests of passengers and freight users.
- Standards are drafted by technical committees and experts to ensure safety, compatibility and efficiency across the network. The standards often align with the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS).
- ROGS requires rail operators to hold safety certification and manage risks through a SMS. This includes a legal requirement to comply with national safety rules for infrastructure and vehicle operations.

2. Main Features of the UK Standards Framework

- The Railway Standards Code and Standards Manual, overseen by the RSSB, governs how rail standards are created, amended, and published.

- Standards are developed by industry committees with representation from across the sector, including infrastructure managers and train operators.
- The types of standards are:
    - Railway Group Standards (RGSs): These are mandatory rules for the mainline railway.
    - National Technical Specification Notices (NTSNs): These are minimum specifications for safety, interoperability, and compatibility.
    - Rail Industry Standards (RISs): These comprise specific technical requirements for subsystems.
    - Guidance Notes (GNs): These consist of advice on industry best practice.
- International Alignment**:** While focused on UK requirements, the system also frequently adopts or references to British (BS), European (EN), and International (ISO) rail standards.

3. Legislative Basis for RSSB Operations

The RSSB is an independent, not-for-profit company limited by guarantee. Despite not being a government entity under legislation, RSSB's authority is supported by several other legal mechanisms. These are -

- **Licence Conditions:** The ORR issues rail operating licences under the *Railways Act 1993*, A mandatory condition of the licences is that operators must be members of RSSB and comply with the Railway Group Standards (RGSs) it manages.
- **Interoperability Regulations:** The Railways (Interoperability) Regulations 2011 allow the RSSB to propose National Technical Rules (NTRs) to the Department for Transport. Once published by the Secretary of State, these rules gain formal legal status and bind operators.
- **Official Oversight:** The ORR formally approves the RSSB's constitution and its Railway Group Standards Code to ensure transparency and accountability.

4. Statutory Authority: The Railways Act 1993

The requirement for RSSB membership and standards compliance arises from sections 6, 8, and 9 of the Railways Act. Briefly, the sections require the following -

- **Section 6:** Makes it a criminal offence to operate a railway asset without a valid licence or exemption.
- **Section 8:** Grants the power to issue these licences to the Secretary of State or the ORR.
- **Section 9:** Permits the ORR to include "requisite or expedient" conditions in operator's licences. Current key conditions of licences are -
    - **Condition 8 (RSSB Membership):** Mandates membership (under section 9(2)(a)).
    - **Condition 9 (Standards Compliance):** Mandates adherence to Railway Group Standards.
- **SNRP:** conditions for mainline operators are detailed in the Statement of National Regulatory Provisions (SNRP), issued under the Railway (Licensing of Railway Undertakings) Regulations 2005.

5. Membership Fees and Funding Authority

- **Legal authority for fees:** The RSSB membership fee is a contractual levy arising from the membership required by the operator's licence. By joining RSSB (as required by the

Railways Act), operators agree to the RSSB Constitution Agreement which compels them to pay an annual levy.

- **Calculation Methodology:** It should be noted that RSSB membership fees are **not** uniform. The fees are calculated using a cost-sharing model based on the size and nature of the rail operator. The fee has two components -
    - **Fixed Component:** This is a base administrative fee.
    - **Variable Component (The Levy):** The levy is determined by the operator's relevant turnover or operating scale (e.g. track kilometres or passenger miles).
- **Current Funding:** The total industry levy typically exceeds £40 million annually. Individual company fees are determined by their specific member category (e.g., passenger, freight, or infrastructure manager).

6. Derogation from Standards

If an operator cannot comply with a mandatory standard, they must apply for a derogation from the standard. The process for this is -

a) **Application:** The operator submits a request to the RSSB explaining why compliance is not "reasonably practicable."

b) **Risk Evidence:** The applicant must demonstrate that their alternative approach maintains an equivalent level of safety.

c) **Technical Review:** A RSSB committee reviews the evidence and consults with affected industry parties.

d) **Approval:** If approved, a Letter of Derogation is issued, and this permits a specific departure from the rail standard under defined conditions.

Other Australian Standards, Accreditation & Assurance Bodies

Summary

There are several Australian industry bodies involved in standards, accreditation and assurance that provide models for supporting broad industry participation, including

- Standards Australia Limited
- Quality Innovation Performance Limited (QIP)
- Australian Council on Healthcare Standards (ACHS)
- Australian Institute of Building Surveyors Ltd.

1. Standards Australia Limited

Standards Australia is a not-for-profit company limited by guarantee with an annual revenue ~A$53 million (2025). They have mixed revenue sources including:

- member contributions – via subscription and participation is a relatively minor component of funding.
- standards-related income - through licenses from sale/distribution of Australian Standards and royalty/licensing income, which is a core funding source for operations and reinvestment.
- Accreditation fees from other bodies authorised to develop standards and standards development services for projects, particularly where industry sponsors new standards.
- Investment income / strategic funds – from initiatives including the Standards Australia Future Fund, investing to support innovation and potentially generate returns

2. Quality Innovation Performance Limited (QIP)

QIP is a not-for-profit accreditation company limited by guarantee funded almost entirely through a user-pays model of fees (application fees, audit fees, annual fees and reassessment fees) for accreditation and certification services and standards assessment programs and associated services rather than membership subscriptions.

QIP revenue resembles a regulated service market, where accreditation is often required or strongly expected in the sector – effectively income is a quasi-levy via regulatory requirements (organisations must pay to be accredited).

3. Australian Council on Healthcare Standards (ACHS)

ACHS is a not-for-profit company limited by guarantee with a predominantly fee-for-service accreditation model, similar to QIP but larger and more system-embedded. Funding is not a formal levy, but effectively compulsory fees charged to industry driven by government accreditation frameworks. Health service organisations pay:

- to be members with membership typically linked to participation in accreditation programs rather than a pure subscription model
- to be assessed against standards (e.g. NSQHS) and accreditation is often mandatory or strongly required by regulators, creating stable, recurring
- to subscribe revenue. to participate in Clinical Indicator Programs for (benchmarking and reporting).
- for services in Improvement Academy programs, workshops, advisory services.

4. Australian Institute of Building Surveyors Ltd (AIBS)

AIBS is a voluntary member-funded professional association, a company limited by guarantee, supplemented by accreditation and professional services revenue. The membership structure is tiered with annual fees by member type and other income generated via:

- fees for Professional accreditation assessments and administrative appeals processes
- Conferences, CPD programs, training activities.
- Partnerships and events may generate additional income

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