

Submission to the National Transport Commission

Options to harmonise rolling stock testing and test locations – Discussion Paper submitted by National Intermodal Corporation

National Intermodal Corporation welcomes the opportunity to respond to the National Transport Commission's consultation on options to harmonise rolling stock testing requirements and test locations.

Background

National Intermodal Corporation's mandate is to improve the efficiency, resilience and sustainability of Australia's freight supply chains, including through the delivery of nationally significant, common-user and open-access intermodal precincts. In this role, National Intermodal has a direct interest in reforms that improve rail competitiveness, support interoperability across networks and reduce unnecessary barriers to investment, innovation and market entry.

Reform Priorities

National Intermodal supports the objective of harmonising rolling stock testing requirements and test locations. The current framework remains fragmented across jurisdictions and Rail Infrastructure Managers (RIMs), creating duplicated testing, inconsistent documentation and acceptance requirements, longer approval timeframes and higher costs for operators seeking access to multiple networks. This affects the commercial attractiveness of rail freight by increasing the cost and risk of deploying rollingstock, particularly for new entrants and operators seeking to invest in more productive, efficient or lower-emissions equipment. This also undermines the value of national infrastructure investment by limiting the seamless use of rolling stock across interstate corridors.

Harmonisation of registration alone will not be sufficient if inconsistent RIM requirements continue to be applied after national registration. National Intermodal considers that RIM interface requirements should be standardised to the greatest extent possible. Any residual variations should be limited to matters that are necessary for safety, clearly documented, transparent to industry and subject to a pathway for progressive harmonisation. This distinction is critical. Without discipline around post-registration requirements, reform risks simplifying the administrative front end while preserving the practical barriers that prevent true interoperability.

National Intermodal emphasises that testing reform is directly linked to investment outcomes. A more certain and nationally consistent approval pathway would reduce the cost and risk of deploying new rollingstock, support investment in higher productivity and lower-emissions equipment, and improve the commercial viability of rail freight. These outcomes are central to supporting mode shift from road to rail, decarbonising supply chains and strengthening the resilience of the national freight system.

Conclusion

National Intermodal Corporation strongly supports the harmonisation agenda and encourages the National Transport Commission to pursue reforms that deliver practical mutual recognition across networks, rather than partial alignment of process.

The preferred reform direction should establish nationally harmonised testing and registration requirements, standardise RIM interface requirements and minimise post-registration variation. This would reduce duplication, lower barriers to entry and investment, and support a more competitive, interoperable and sustainable national rail freight system.