

National Transport Commission  
Public Submission – RSNL C-RIS  
Level 3 Bourke Street  
Melbourne, Victoria 3000

Email: [enquiries@ntc.gov.au](mailto:enquiries@ntc.gov.au)

Dear Sir

### **Changes to RSNL C-RIS**

Roads ACT, as the delegated Road Authority and Road Manager for all public roads managed by the ACT Government, does not support the *'RSNL Review recommendation 22. The Regulator be given the power to review and direct amendments to interface agreements to ensure that they are suitable for the effective management of safety interface risks, and the power to direct improvements where no interface agreement is in place'*.

Roads ACT considers that this would be an intolerable overreach by the Rail Regulator who cannot fully appreciate the scope of the role that Road Authorities undertake in managing, regulating, and funding road infrastructure.

The suggestion that the Rail Regulator could be given the power to compel Road Authorities to enter into an interface agreement of their design, and that the Rail Regulator be given the power to review and direct amendments to those agreements is not supported. Such powers could give rise to Road Authorities being compelled to undertake work that is not in the best interest of road users and the general public. For example, it could result in the Road Authority being compelled to grade separate rail crossings at the road authority's expense. It could also lead to rail authorities dictating road safety solutions that are unfounded, disproportionate and, in some cases, unsafe for road users.

A better mechanism might be to give the rail regulator the power to compel that Road Authorities enter into interface agreements or accept that a model interface agreement would apply. This is a similar arrangement to other regulations. This type of arrangement allows Road Authorities to manage their risks and resources without undue and unnecessary interference.

Should you have any questions, please contact me via email.

Yours sincerely

<Signature removed>

Tim Rampton  
Executive Branch Manager, Roads ACT  
29 April 2026