



ARNECC Model Operating Requirements Version 8

Stakeholder briefing 17 June 2026

Acknowledgement of Country

We acknowledge the Traditional Owners of the land on which we meet or are dialling in from today and pay our respects to Elders past and present.

6/25/2026

2

OFFICIAL

Key MOR Proposed v8 amendments

ARNECC welcomes this opportunity to update stakeholders on the draft amendments proposed in version 8 of the Model Operating Requirements (MOR).

The key amendments proposed in MOR version 8 are intended to:

- uplift cybersecurity requirements for ELNOs and Subscribers through the ELNO's Subscriber Security Policy,
- uplift insurance requirements,
- allow flexibility in relation to approved Public Key Infrastructure and Digital Certificates, and
- refine compliance reporting requirements including for Independent Experts and Certifications.

ARNECC is seeking feedback from stakeholders on these proposed changes as part of the standard consultation process for proposed amendments to the MOR.

Cybersecurity requirements uplift

ELNO cybersecurity requirements

- ISMS to be certified as compliant with ISO Standard 27001 and mandate of internal audits and testing of the ISMS.
- Expanded inclusions for ISMS e.g. incident response 'playbooks', protection against phishing .
- ELNO to provide Self-Certification that the ELNO is actively monitoring and responding to cyber security threats.

Uplift ELNO's internal testing and reporting by the ELNO

- The business and continuity disaster recovery program to be tested annually.
- ELNO to perform sampled assessments of Subscriber's compliance with their Subscriber Security Policy.
- ELNO to undertake cyber incident 'table top' exercises with Registrars and Operators when requested.
- Increased access controls to require personnel are appropriately of good character and have been trained and are aware of the ELNO's security obligations.
- ELNO required on request by the Registrar to provide a remediation plan for proposed changes to the ISMS to address any identified gaps.

Cybersecurity requirements uplift

Data retention

- Allow ELNO to reproduce or disclose Land Information when required to do so by law without having to first seek Registrar approval, but the Registrar must be notified in writing prior to the reproduction or disclosure.
- Allow ELNO to destroy or de-identify data containing personal information after 15 years or the expiry of any other relevant statutory period in a jurisdiction in which the ELNO operates, provided such destruction is done in a specified manner and does not impact Land Information, otherwise the data must be permanently retained.
- ELNO must retain a back up of critical data and systems.

Insurance uplift

- Increase professional indemnity minimum coverage to \$20,000,000 aggregate and not less than \$5,000,000 per claim.
- Increase public and product liability insurance minimum coverage to \$20,000,000.
- New requirement for an ELNO to hold insurance to cover cybersecurity including:
 - Professional indemnity for cyber incidents
 - Coverage for enterprise risks including incident response, business interruption and data and system recovery.
- New requirement for the ELNO to obtain any insurance it considers necessary for first- and third-party risks associated with operating as an ELNO.
- New requirement for the ELNO to inform the Registrar of any material change to its coverage.
- New requirement for insurance to continue after an ELNO's Approval ends to allow for reporting of claims for six years after expiry, revocation or surrender of the ELNO's Approval.

Compliance reporting uplift

- New requirement for the ELNO to have its:
 - Financial resources,
 - Technical resources,
 - Organisational resources, and
 - Separation Plan,reviewed by an Independent Expert at least annually.
- New requirement for the ELNO to provide the Registrar with a copy of its register of Subscribers and Users including those whose registration has been restricted, suspended, terminated or otherwise ended, and why.
- If an ELNO provides an updated version of any document previous provided to the Registrar, the ELNO must provide the updated version of the document in mark-up and provide a rationale for the material changes made to the document since last provided to the Registrar. This applies to any document provided to the Registrar as part of compliance reporting.

Compliance reporting uplift

- The Registrar does not have to examine an Independent Expert report to be able to rely on it:
 - The Independent Certification must include Essential Recommendations and advise on implementation of previously reported Essential Recommendations.
 - Once approved, it is the ELNO's responsibility to ensure that an Independent Expert continues to meet requirements.
 - Until an Essential Recommendation is implemented, the ELNO must provide a monthly report on progress of implementation.
- Self-Certifications are to be stated to be for the benefit of the Registrar and the Registrar does not have to examine any document annexed to the Self-Certification to be able to rely on it.

General updates

- References to Public Key Infrastructure and Digital Certificates amended to provide flexibility for the Registrar to approve another Public Key Infrastructure, accreditation authority or service provider if Gatekeeper is decommissioned prior to another version of the MORs being published.
- Inserting definition of NECDS Ltd and formalising that NECDS Ltd is not a Supplier, which is currently dealt with by waiver.
- ELNO required to not outsource any part of the ELNO System which deals with Land Information without Registrar approval.
- Clarifying that an ELNO's general obligation is to ensure security and integrity of the ELNO System in compliance with all applicable standards. If a standard exists and applies that is of a higher standard than the MOR, the MOR does not exempt the ELNO from complying with that higher standard, and vice versa for complying with the MOR.
- To align with amendments in the Model Participation Rules outlined in Model Participation Rules proposed version 8.



Questions

Thank you for your ongoing contribution and support for ARNECC's work, and for engaging in the consultation process of proposed version 8 of the Model Operating Requirements.

If you have any further questions on this, please contact ARNECC at chair@arnecc.gov.au as soon as possible. Submissions are due to ARNECC at chair@arnecc.gov.au no later than 17 July 2026.