



The Trustee for Anchoram Consulting
ABN 85 197 062 817
Level 1, Suite 3, 16 Napier Close
Deakin, ACT 2600
Tel: +61 1300 042 833
www.anchoramconsulting.com.au

Mr Hamish Hansford
Head of National Security
Home Affairs
Canberra ACT 3000
Australia

Dear Hamish,

I hope you have had a chance to read our white papers on cyber and AI that I sent you after our last meeting. The papers were developed by senior participants at a round table hosted by Anchoram Canada. I recently had the honour of meeting with the Canadian Deputy Minister Stewart whilst he was in Australia, and he indicated a strong interest in the white papers and he now has copies.

Anchoram Consulting appreciates the opportunity to provide feedback on the proposed enhancements to the Critical Infrastructure Risk Management Program Rules. As a security advisory firm specialising in cybersecurity, protective security, operational technology security, and critical infrastructure protection, Anchoram works extensively with asset owners and operators who are directly impacted by these regulatory obligations across energy, transport, water, and government sectors.

We are strongly supportive of the intent behind the proposed enhancements to strengthen cyber and operational resilience across Australia's critical infrastructure landscape. The move towards more prescriptive requirements aligned with a broader all-hazards approach will help improve maturity and accountability in cyber risk management for critical entities.

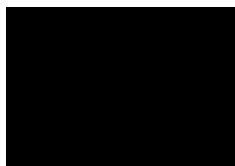
Anchoram has observed through its advisory work that greater clarity and consistency in the application of the CIRMP rules significantly improves compliance outcomes and risk management capability. Accordingly, we welcome further refinement that reinforces practical implementation of controls, assurance mechanisms, and measurable outcomes.

As the CIRMP rules evolve we recommend that the Department consider mandating or formally recognising suitable technical and industry-specific standards and recommend that an oversight for consideration would be to address the exclusion of AS 62443 which is a significant oversight to address fundamental issues in the design of control systems.

Leveraging these proven standards would provide regulated entities with consistent, outcomes-based mechanisms to address sector-specific risks in a measurable and auditable manner.

Anchoram also wishes to highlight the success of targeted government and industry-led initiatives such as CI Fortify, which are already delivering measurable capability uplift in the sector. Similarly, government led programs that focus key security aspects such as NEPKI that demonstrate the value of targeted capability development within a specific industry context.

Anchoram Consulting reiterates its full support for the enhancement of the CIRMP Rules and commends the focus on continuous improvement, sector alignment, and cyber resilience and we believe that incorporating existing proven standards and frameworks, fostering cross-sector capability programs, and maintaining flexibility for sector specific maturity models will yield the greatest long-term benefit for Australia's critical infrastructure ecosystem.



Glenn Ashe
Chief Executive Officer
Anchoram Consulting