

13 February 2026

Department of Home Affairs
Australian Government

RE: Proposed Amendments to the Critical Infrastructure Risk Management Program (CIRMP) Rules

Dear Madam /Sir,

Squadron Energy welcomes the opportunity to respond to The Department of Home Affairs's consultation on proposed amendments to the Critical Infrastructure Risk Management Program (CIRMP) Rules.

Squadron Energy is Australia's leading renewable energy company that develops, operates and owns renewable energy assets in Australia. We are 100% Australian owned and committed to leaving a lasting legacy for the communities where we operate. We have 2 gigawatts (GW) of renewable energy in operation and under construction. With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

To address forecast gas shortfalls and energy security risks in Australia's east coast gas market, SQE has repurposed the former Port Kembla coal terminal into a liquefied natural gas regassification facility, the Port Kembla Energy Terminal (PKET). PKET is constructed, approved and operationally capable with all onshore infrastructure installed, supported by a floating storage and regasification unit (FSRU) that we have secured under a long-term charter.

SQE remains fully supportive of a balanced, risk proportionate regulatory framework that safeguards Australia's critical infrastructure while enabling efficient and renewable energy development and emissions reduction. In this submission we would like to raise the following points:

- Differentiation of risk across types of "Electricity Assets" is a more measured application of the proposed risks
- Maintaining principle-based flexible approach to risk management will deliver proportional and better outcomes
- Proposed supply chain mapping and FOCl requirements risk inadvertently limiting supplier diversity needed to support a timely energy transition

Differentiation of risk across types of "Electricity Assets" is a more measured application of the proposed risks

The proposed amendments apply to all infrastructure captured under the definition of *critical infrastructure – electricity asset*. We consider that not all assets within this category present the same level of risk. The various generation technologies have fundamentally different roles and risk profiles in the energy system. For example, dispatchable generation such as thermal coal plants and gas peakers present more material risks given their role in maintaining system stability and reliability. SQE recommends that the Department consider inherent differences in risk across asset types within the energy system and align compliance obligations accordingly, with a focus on minimising compliance obligations for intermittent generators.

Maintaining principle-based flexible approach to risk management will deliver proportional and better outcomes

SQE supports a regulatory framework that requires asset owners to assess and manage their specific risks. Several of the currently proposed amendments—such as mandatory five-year AusCheck requirements for critical workers—shift towards more prescriptive, uniform obligations.


Individual businesses are best placed to determine proportionate mitigation strategies based on their operational context, security needs and workforce capability. Retaining flexibility in how obligations are operationalised will lead to stronger and more sustainable security outcomes.

Increasingly prescriptive requirements, including the documentation of risks that may not be material to individual businesses, could elevate compliance costs and administrative burden without necessarily strengthening the resilience of critical infrastructure assets. A principle based, risk proportionate approach that allows entities to tailor responses to their unique threat environments will deliver more effective, efficient, and sustainable security outcomes.

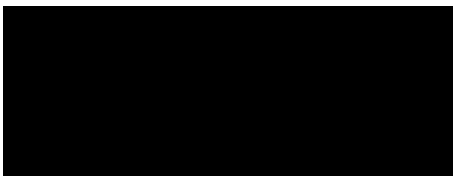
Proposed supply chain mapping and FOCI requirements risk inadvertently limiting supplier diversity needed to support a timely energy transition

The proposed requirement to map all critical suppliers and dependencies, identify “vendors of concern,” and demonstrate the treatment of identified risks represents a significant uplift in compliance expectations. When coupled with the heightened focus on Foreign Ownership, Control or Influence (FOCI), these measures may inadvertently constrain an already limited supplier market. Maintaining access to a diverse and competitive global supplier base is essential for supply chain resilience, innovation, and cost-effectiveness.

A narrow focus on country of origin or ownership structure risks creating de facto exclusion of certain vendors without clear, evidence-based justification. This is of particular concern for the renewable energy sector, which relies heavily on overseas original equipment manufacturers. Restrictive or perceived restrictive settings may slow the rollout of renewable generation, increase project costs, and work counter to national energy transition and emissions-reduction goals.

We look forward to continued engagement with the Department of Home Affairs in relation to managing critical infrastructure security. If you would like to discuss this submission or any related content, please contact Rupert Doney, Director - Energy Policy & Regulation at 

Yours sincerely,

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Paul Alexander GM-Development
For and behalf of Squadron Energy Services Pty Ltd