Zero damage - Zero harm - Zero disruption

Before You Dig Australia
Level 5, 447 Collins Street
Melbourne VIC 3000

Before You Dig Australia submission on the proposed enhancements to the Critical Infrastructure Risk Management Program Rules (CIRMP Rules)

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About Before You Dig Australia (BYDA)

Before You Dig Australia (BYDA) is a national not-for-profit organisation that operates Australia's primary referral service for underground utility asset location information. BYDA has over 850 asset owner members across the electricity, oil and gas, water, and telecommunications sectors, as well as local councils and some non-utility asset owners, corresponding closely to the asset classes to which the amendments apply. BYDA also has over 700,000 registered service users and processes more than 2.7 million requests for underground utility asset location plans annually.

BYDA became a member of the Trusted Information Sharing Network (TISN) in 2026 and has contributed to SOCI policy development on prior occasions, including through direct engagement with the Cyber and Infrastructure Security Centre (CISC) that resulted in updated guidance under section 42AA of the Act. BYDA welcomes the opportunity to provide further input through this consultation process.

Overview

BYDA welcomes the introduction of section 11A into the Enhanced CIRMP Rules. Requiring responsible entities for high-risk critical infrastructure assets to centrally manage physical security risks, and to document the location, ownership and nature of their assets, is a sound and necessary reform.

This submission makes three targeted recommendations to strengthen the drafting and associated guidance. Each recommendation draws on BYDA's operational experience and the evidence base developed through its members' direct exposure to the physical hazards the enhanced Rules are designed to address.

Recommendation 1: Name third-party excavation and ground disturbance as a physical hazard in section 11A

The Exposure Draft does not identify third-party excavation or ground disturbance as an example of a physical security hazard, despite it being among the most prevalent causes of physical damage to critical infrastructure assets in Australia.

BYDA's 2024 Economic Assessment of Utility Strikes in Australia[1] found that more than 15,000 utility strikes are reported annually, and that these incidents cost the Australian economy

[1] https://www.byda.com.au/wp-content/uploads/2026/02/BYDA-Economic-Assessment-of-Utility-Strikes-in-Australia-2024.pdf

over $4.6 billion per year in indirect and social costs, 32.4 times higher than direct repair costs, and up to 160 times higher for telecommunications assets. These strikes affect the asset classes covered by section 11A, including electricity, oil and gas, water, liquid fuel, and telecommunications infrastructure.

At present, the Exposure Draft does not name excavation and ground disturbance as a hazard within the scope of section 11A. This creates a risk that responsible entities will not systematically identify or manage this risk within their CIRMPs. BYDA recommends that the notes or explanatory material accompanying section 11A include third-party excavation and ground disturbance as a named example of a physical security hazard. This approach is consistent with the treatment of underground asset location data already reflected in CISC's guidance under section 42AA of the Act, as discussed in Recommendation 3 below.

Recommendation 2: Include digital underground utility asset location data management, as an example process supporting section 11A(2)(a)

Section 11A(2)(a) requires responsible entities to document the location, ownership and nature of their assets. The Exposure Draft does not indicate what processes or standards are considered appropriate for meeting this obligation.

BYDA recommends that the notes or best-practice guidance accompanying the Rules reference digital underground utility asset location data management, consistent with Australian Standard AS5488 (Classification of Subsurface Utility Information) and the Open Geospatial Consortium's Model for Underground Data Definition and Integration (OGC MUDDI), as an example process supporting compliance with section 11A(2)(a).

AS5488 and OGC MUDDI are existing, industry-endorsed standards for classifying and managing underground utility asset location data. They provide a technically rigorous and implementable framework that responsible entities can adopt without requiring bespoke systems.

The value of asset location documentation under section 11A(2)(a) is only fully realised when that information is accessible in a timely and usable form to those who require it, including designers, planners and excavators working in proximity to critical infrastructure. Digital asset location data management, consistent with AS5488 and OGC MUDDI, provides the technical foundation for that accessibility. These standards enable structured, machine-readable asset location data to be shared securely and at scale, in a form that supports both internal risk management and the authorised external disclosures contemplated by section 42AA of the Act. Naming these standards in guidance would provide responsible entities with a clear and technically grounded pathway to meeting their section 11A(2)(a) obligations, in a manner consistent with the broader risk mitigation purpose of the enhanced CIRMP framework.

Recommendation 3: Reference the section 42AA guidance in the best-practice guidance published alongside the finalised Rules

CISC's published guidance on protected information (March 2025)[2] includes the following example of a permitted disclosure under section 42AA of the Act:

> *"A construction company needs to know the location of a critical telecommunications asset (underground cable) before commencing digging works. The location is included in the asset registration and can be shared to prevent the company striking it and disrupting services (including design and engineering stages of a construction project)."*

This example establishes that sharing underground utility asset location data with excavators is an authorised disclosure under the Act where it is for the purpose of preventing damage to a critical infrastructure asset. However, BYDA's experience is that responsible entities frequently remain uncertain whether sharing asset location data is permissible under the SOCI Act, and that this uncertainty acts as a barrier to sharing information that would otherwise reduce physical risk to critical infrastructure.

BYDA recommends that the best-practice guidance published alongside the finalised Rules include an explicit cross-reference to the section 42AA guidance and its underground asset location data example. This would assist responsible entities in understanding that sharing underground utility asset location plans is consistent with both the letter and the purpose of the enhanced CIRMP framework.

Conclusion

The three recommendations in this submission are complementary and straightforward to implement through the notes and best-practice guidance accompanying the finalised Rules, without requiring amendment to the operative provisions of section 11A itself. Collectively, they would ensure responsible entities systematically identify third-party excavation as a physical hazard requiring management under the enhanced CIRMP framework, provide a clear and standards-aligned pathway for meeting the asset documentation obligation in section 11A(2)(a), and address the regulatory uncertainty that currently impedes responsible entities from sharing underground utility asset location information as a risk mitigation measure.

Contact

BYDA is a member of TISN and welcomes ongoing engagement with the Department on these matters. We are available to provide further information in support of this submission.

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[2] https://www.cisc.gov.au/resources-subsite/Documents/cisc-factsheet-protected-information.pdf