



1 May 2026

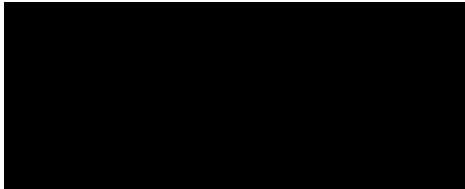
Australian Government
Department of Home Affairs
Critical Infrastructure Security Centre

Submission on proposed amendments to enhance the Critical Infrastructure Risk Management Program Rules

FiberSense Ltd welcomes the opportunity to provide this submission in response to the Department of Home Affairs' consultation arising from the Independent Review of the Security of Critical Infrastructure Act 2018 (Cth) (**SOCI Act**).

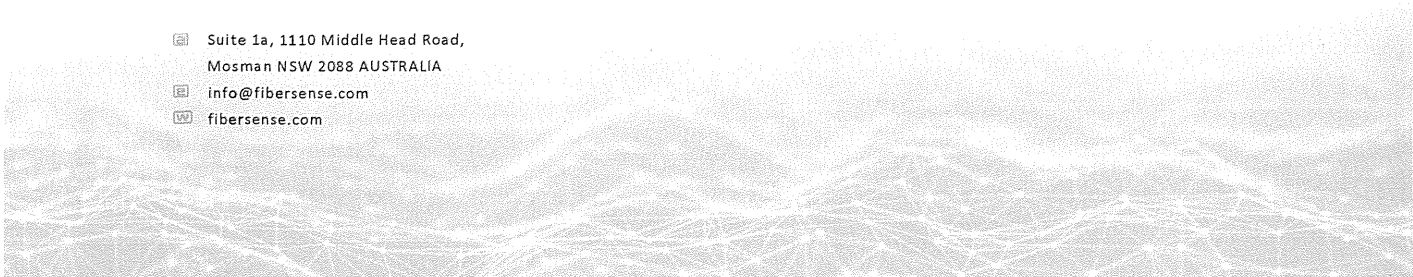
Please find our submission attached for your consideration.

Yours sincerely,



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About FiberSense

FiberSense is an Australian technology company specialising in advanced fibre optic sensing, monitoring, and analytics solutions that support the security, resilience, and operational assurance of critical infrastructure assets. Our solutions are deployed across telecommunications, energy, water, transport, and subsea environments, supporting infrastructure owners and operators to proactively detect, assess, and respond to physical and operational risks.

FiberSense's proprietary Distributed Acoustic Sensing (DAS) technology converts existing fibre optic cables into continuous, real-time sensing networks that detect, classify and locate physical threats along infrastructure corridors. Unlike periodic inspection regimes or point-based sensor arrays, DAS provides uninterrupted 24/7 coverage across entire cable routes, enabling infrastructure owners and operators to move from reactive incident management to proactive threat detection and prevention. This capability directly supports the objectives of the SOCI Act by strengthening situational awareness, compressing incident response times, and generating the continuous, auditable operational record that robust critical infrastructure governance demands.

Our real-time monitoring technology can provide unique robustness to responsible entities' risk management plans by allowing them to detect and mitigate physical threats in a timely manner as part of the "all-hazards" approach to critical infrastructure risk management. FiberSense brings this to life in several SOCI Act critical industry sectors:

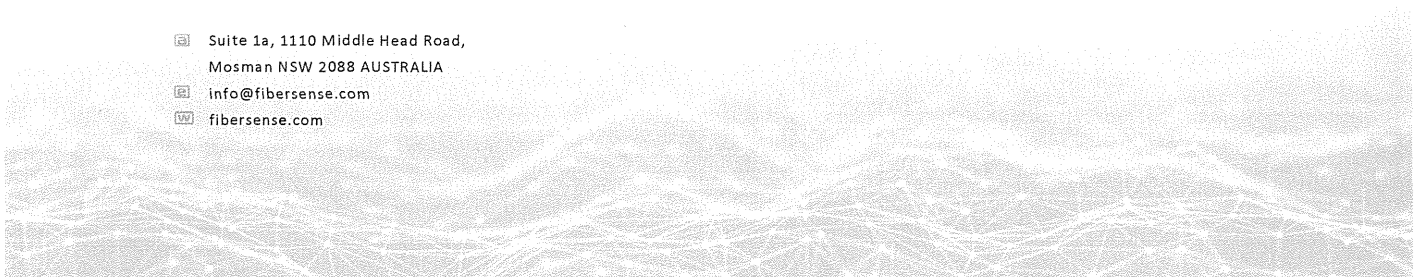
- **Telecommunications & Electricity:** FiberSense's DigitalAsset and DigitalMarine provide continuous sensing on terrestrial and subsea networks. DigitalAsset provides continuous real-time detection and classification of physical activity along telecommunications duct networks, power transmission corridors and other distributed linear infrastructure - identifying excavation, vehicle intrusion and third-party interference before damage occurs. Our DigitalMarine fleet spans more than 30 submarine cable landing deployments across 12 countries and has verified over 23,000 marine events from a continuously expanding operational dataset.
- **Drinking Water, Wastewater & Gas:** DigitalLeak enables early detection of leaks, ground disturbance and structural anomalies along water, gas and other pipeline assets before they escalate to service disruption or environmental harm. The result is a scalable, cost-effective capability that is well suited to the distributed character of Australia's critical infrastructure network.

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As the cost of infrastructure failures - economic, reputational and national security - continues to rise, real-time distributed sensing represents one of the few available technologies that simultaneously delivers operational risk reduction, board-level assurance, and a compelling, independently verifiable return on investment.

Proposed CIRMP Rules

FiberSense supports the objectives of the SOCI Act and recognises its role in strengthening the security and resilience of Australia's critical infrastructure. We acknowledge that the SOCI framework and CIRMP Rules (along with its sister TSRMP Rules) have materially improved board-level awareness, governance maturity, and visibility of infrastructure risks, and we consider the Act to be broadly effective in establishing baseline national safeguards.

At the same time, FiberSense supports the continued maturation and refinement of the framework to ensure it remains outcomes-focused, proportionate, and well aligned with existing sector-specific regulatory regimes. Internationally, comparable critical infrastructure resilience frameworks are converging on similar principles. In particular, the European Union's Critical Entities Resilience (CER) Directive (2022/2557) places accountability for physical risk management and resilience planning with asset owners. In particular, it requires responsible entities to report incidents that significantly disrupt or have the potential to significantly disrupt the provision of an essential service within 24 hours of becoming aware of the incident. This reflects a shared emphasis on operator-led, risk-based outcomes rather than compliance-driven implementation.

Drawing on our experience supporting operators across multiple critical infrastructure sectors, we highlight several targeted areas for consideration in the consultation paper.

These include:

- The need for proportionate, asset-specific approaches to physical and cyber risk management;
- Growing risks to subsea and distributed infrastructure assets;
- The role of monitoring and assurance capabilities in supporting SOCI resilience objectives; and
- The importance of clarity as obligations evolve to address emerging technologies and asset classes.

FiberSense is committed to working collaboratively with government and industry to support a practical, scalable and effective critical infrastructure security regime.

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Closing

FiberSense supports the continued evolution of the SOCI framework and appreciates the opportunity to contribute to this consultation. We believe the Act has established a strong foundation for critical infrastructure security and resilience, and that targeted refinements can further improve its effectiveness while supporting innovation and operational excellence.

FiberSense encourages the Department to recognise real-time Distributed Acoustic Sensing as an important enabling technology for SOCI resilience objectives, particularly as external assurance to effectively manage physical risks. We support approaches that provide responsible entities with clarity on how auditable, technology-backed monitoring capabilities can satisfy and complement SOCI risk management, governance and assurance requirements.

We welcome ongoing collaboration with the CISC, other government agencies, and industry stakeholders to ensure Australia's critical infrastructure is secure, resilient, and fit for the future.

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