

13 April 2023

Department of Home Affairs

Australian Government

via email: auscyberstrategy@homeaffairs.gov.au

EVC Submission to 2023 – 2030 Australian Cyber Security Strategy Discussion Paper

The Electric Vehicle Council (EVC) is the national peak body representing the electric vehicle industry in Australia. Our mission is to accelerate the electrification of transport for a sustainable and prosperous future. We represent members across the electric vehicle (EV) value chain, including car, bus and truck manufacturers, importers, operators, charging infrastructure suppliers, battery reuse and recycling companies, financiers, and network providers.

As the EV market continues to accelerate in Australia, our work is particularly aimed at increasing certainty for investment through policy, knowledge sharing and education.

The EVC is supportive of the Australian Government's efforts to improve national cyber resilience through its Cyber Security Strategy 2022-2030. The EVC is specifically interested in legislative reforms being considered by the Government that may introduce regulatory obligations for operators of EV charging infrastructure, including the potential expansion of the types of assets falling under the scope of the *Security of Critical Infrastructure Act (Cth)* (SOCI).

The EVC recommends further consultation with industry on specific legislative changes that may expand the definition of critical infrastructure under the SOCI framework. At present, the definitions of critical electricity assets are limited to transmission and distribution networks servicing over 100,000 customers and large electricity generation assets. While the Government is not specifically proposing to include EV charging infrastructure within the scope of the SOCI Act, the broad expansion of 'critical assets' definitions to include systems may have implications for the EV charging sector.

It is important that any changes to the scope of the SOCI framework are proportionate to the risks posed to public safety and security. While EV uptake is increasing, the number of EVs on the road in 2030 is unlikely to reach a level where concerted malicious action or operational disruption could compromise the energy system in a significant way. The premature inclusion of EV charging infrastructure in the SOCI framework would instead increase the compliance burden for industry and impede EV uptake, compromising our ability to achieve national emissions reduction targets.

As an alternative, the EVC supports the Government working with industry to develop more broadly a set of minimum standards for EV charging infrastructure. These standards could include reasonable cyber security strategies for protecting consumer data, and protecting against the risk of harm to, or disruption of, charging infrastructure and the grid.

Australia should look to our overseas counterparts with much higher levels of EV uptake than us and consider the cyber security strategies those jurisdictions have adopted as part of minimum EV charging infrastructure standards. This will ensure any requirements set for EV charging infrastructure in Australia align with international best practice.

For example, the US Federal Highway Administration released its final rule on National Electric Vehicle Infrastructure Standards and Requirements in early 2023, which includes consideration of range of minimum standards of public charging infrastructure – specifically those that receive public funding.¹ These requirements include minimum standards for installation, operation, maintenance, signage, data-sharing, real-time availability, uptime reliability, as well as cyber security strategies.

In our view, the appropriate pathway for addressing cybersecurity for EV charging infrastructure would involve considering cybersecurity requirements within a holistic framework of minimum standards for EV charging, in line with the approach of other jurisdictions.

If you have any questions on this submission, our team can be contacted at:

[REDACTED]

Thank you for your consideration of our submission.

Yours sincerely,

[REDACTED]

Behyad Jafari
Chief Executive Officer
Electric Vehicle Council

¹ <https://www.federalregister.gov/documents/2023/02/28/2023-03500/national-electric-vehicle-infrastructure-standards-and-requirements>