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26 November 2020



Critical Infrastructure Centre
Department of Home Affairs

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Dear Mr Kiley

**AMPOL SUBMISSION ON THE EXPOSURE DRAFT SECURITY LEGISLATION AMENDMENT
(CRITICAL INFRASTRUCTURE) BILL 2020 AND EXPLANATORY MEMORANDUM**

Ampol is pleased to provide this submission to the Department of Home Affairs on the Exposure Draft Security Legislation Amendment (Critical Infrastructure) Bill 2020 (the Bill). We also endorse the submission put forward by our industry association, the Australian Institute of Petroleum.

Ampol is the only Australian and ASX-listed fuels and convenience company that operates across the entire downstream fuels supply chain. We proudly supply over one third of all liquid transport fuels used in Australia through our global supply operations, local manufacturing capabilities and through our market-leading domestic infrastructure. We are a truly independent local market participant, with a Board and management team based in Australia.

Ampol also has Australia's largest fuels storage and handling capacity and we are the owner of significant infrastructure, including the Kurnell import terminal in Sydney, the Sydney to Newcastle pipeline network, the Lytton Refinery, Lytton Terminal and Lubricants manufacturing facilities in Brisbane and the Newport Terminal in Melbourne. We also have strong capabilities to establish new critical infrastructure nationally.

As the largest supplier of liquid transport fuels in Australia, we take our role in the safe and reliable supply of Australia's fuel needs seriously and we have a strong track record of reliable fuel supply through all conditions, including natural disasters and other global shocks and disruptions.

Ampol recognises the need for the Australian Government to maintain confidence in our critical infrastructure and the need for an enhanced framework to underpin its security and resilience. We also



recognise that cyber security is an important component of that framework. We support the Australian Government taking action to protect private companies from cyber-attacks and providing strong deterrents against cyber-crime and nation-state attacks.

We will continue to engage with Government to develop and implement appropriate measures to ensure the continued safe and reliable operation of our critical infrastructure. However, Ampol does not expect that our assets will be nominated as systems of national significance and are anticipating this will be reflected in the rules when they are developed.

The reforms will introduce new obligations and requirements, including cyber-security obligations and Government step-in powers. It remains our expectation that only the more significant assets will have a positive security obligation.

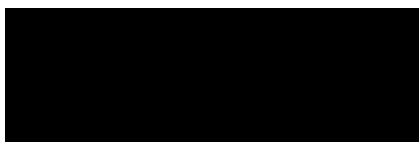
There will be new positive security obligations placed on Ampol as a result of the Bill however, we note that the detail of those obligations will be consulted on in the first quarter of next year. The main concern for Ampol in developing the rules is to ensure that costs of compliance are kept to a minimum, that any new obligations and/or systems and processes are introduced with realistic compliance timelines and that there is not duplication of existing regulatory systems and processes.

To a large extent, Ampol expects that many of the requirements of the Bill will include the use of systems that Ampol already has in place. We also encourage government to recognise and leverage existing systems and regulations already in place when considering what positive obligations should apply to our sector as the rules are developed in 2021. This includes the existence of the National Oil Supplies Emergency Committee (NOSEC) and the Liquid Fuel Emergency Management Act 1984 (Cth).

More specifically, we are concerned that cyber security measures could add significant additional cost as any implementation of new systems may need to occur across our company rather than being applied only to specific assets and infrastructure.

We look forward to engaging with the Department on the regulations in the early part of next year to ensure the security and resilience of critical infrastructure is underpinned, while minimising business and economic impacts.

Yours sincerely



Georgina Koch
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Ampol Limited