

Good afternoon,

Thank you for the opportunity provide a view regarding the Exposure Draft of the Security Legislation Amendment (Critical Infrastructure) Bill 2020 (**the Bill**).

VicTrack is a Victorian Government transport agency and licenced telecommunications provider. In recognition of our systems that enable public transport, our telecommunications network is designated as vital critical infrastructure, as per the *Emergency Management Act 2013 (the Act)*.

Having reviewed the Bill and the explanatory note, VicTrack offers the following views:

- VicTrack would agree that critical infrastructure is increasingly interconnected and interdependent. This position is underlined by the [Global Risks Report 2020](#), which also paints a picture of increasing impact, with regard to critical infrastructure failure.
- Against a backdrop of significant government investment in transport infrastructure as a means of recovering COVID-19 impacted economies, including the development of underground train loops and procurement of rolling stock likely to span the next decade, it is paramount that there be a degree of consistency and simplicity with regard to legislation, regulation and obligation as soon as possible.
- An increasingly interconnected and interdependent landscape should be reasonably offset by more simplistic and consistent legislation and regulation. Arguably, Victoria has a robust and matured approach to this and resilience improvement. The Victorian approach provides an environment (remit) for designated entities to plan for and consider a more broader range of hazards and threat landscapes, extending to major emergencies (pandemic or significant and protracted industrial activity, for example) that may not be within the meaning or intent of the proposed legislation and regulation.
- Victorian entities have an annual (ongoing) obligation to participate in a Resilience Improvement Cycle, which involves the development and management of an annual Statement of Assurance, the conduct of an exercise and an Attestation with regard to the status of emergency risks and their management. These obligations are well captured within the Ministerial Guidelines for Critical Infrastructure Resilience (2017).
- Victoria has an established set of plans and reporting arrangements for serious cyber incidents and a Cyber Incident Response Service embedded within the Victorian Department of Premier and Cabinet.
- It may be that the two above-mentioned views equate to an opportunity for the proposed Australian Government to utilise this model (approaches), with a view to achieving the stated positive security obligations. Any model, whether it be State or Australian government, should be as simple and less burdensome as possible.
- VicTrack would welcome the opportunity to contribute to the review of the Critical Infrastructure Resilience Strategy.

Kind regards,

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