27 November 2020

Department of Home Affairs

Submitted online

DEPARTMENT OF HOME AFFAIRS: EXPOSURE DRAFT ON PROTECTION OF CRITICAL INFRASTRUCTURE LEGISLATION

Origin Energy Limited (Origin) welcomes the opportunity to provide feedback on the protection of critical infrastructure legislation.

The draft legislation mainly sets out the high-level governance framework with much of the formal detail being left for future consultation in the sector specific rules. Until these sector specific arrangements are developed, it will be difficult for industry to begin preparing for the changes.

To facilitate the next stage of work, the Department should publish consultation and implementation timetables for the different sectors of the economy. This should outline the planned timeline for identifying the sector specific regulators; consultation on the definitions for regulated critical infrastructure; and for developing the sector specific rules.

The next stage of consultation should also include working with industry to determine an appropriate implementation timeline once the rules have been finalised. The time allocated to implementation should consider the complexity of the rules, and the extent of assets covered by the new framework.

Additionally, the sector specific rules should rely on existing procedures (such as the Australian Energy Sector Cyber Security Framework) as much as possible, rather than attempting to duplicate well developed processes.

Should you have any questions or wish to discuss this submission further, please contact Alex Fattal via email or phone, on .

Yours sincerely

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