



18 November 2022

Hamish Hansford
Head of Cyber and Infrastructure Security Centre
Cyber and Infrastructure Security Centre (CISC)
Department of Home Affairs

Submitted by email: ci.reforms@homeaffairs.gov.au

Dear Mr Hansford,

Critical infrastructure risk management program consultation

Origin welcomes the opportunity to provide feedback on the draft risk management program rules in relation to the implementation of the recent amendments to the Security of Critical Infrastructure Act 2018.

Origin supports a robust framework that ensures the energy sector is resilient and prepared to respond to potential cybersecurity and other threats to critical infrastructure. As a major asset owner and operator, Origin generally supports the draft risk management program rules but seeks the following clarifications with respect to cyber and information security hazards:

- The draft legislative instrument requires an entity to comply with one of the five frameworks listed, within 12 months of Part 2A of the Act applying to an asset. Framework number 5 requires entities to meet Security Profile 1 (SP1) of the 2020-21 Australian Energy Sector Cyber Security Framework (AESCSF) published by AEMO. Origin understands that AEMO is currently updating the AESCSF, which will contain 29% more requirements to reach compliance.
 - The existing SP1 is already a rigorous and best practice standard – the updated version will be challenging for organisations to meet given these additional requirements. If entities will be required to meet the updated version, then timelines for compliance should be extended beyond the 12 months prescribed in the draft rules so that organisations can realistically meet the additional requirements. In any case, we would welcome clarification on which AESCSF version (current or updated versions) will be sufficient for compliance.
- Currently, organisations are deemed to be compliant with the AESCSF if security practices have been “largely implemented” in accordance with the framework’s definition.
 - We would welcome clarification on how compliance for the risk management program rules will be assessed. Origin considers that the existing process of being deemed compliant if practices are “largely implemented” is appropriate given the rigorous nature of SP1.

If you wish to discuss any aspect of this submission further or require further information, please contact

Yours Sincerely,

Steve Reid
General Manager, Regulatory Policy