



18 November 2022

Attention: The Honourable Clare O'Neil MP
Minister for Home Affairs
Department of Home Affairs

Via Email: ci.reforms@homeaffairs.gov.au

Dear Minister O'Neil

SUBMISSION – DRAFT SECURITY OF CRITICAL INFRASTRUCTURE (Critical infrastructure risk management program) Rules (LIN 22/018) 2022

CS Energy seeks, via this correspondence, to table our overarching feedback with respect to the *Security of Critical Infrastructure (Critical infrastructure risk management program) Rules (LIN 22/018) 2022 (Draft Rules)*¹.

CS Energy is keen to ensure that the final format of the Rules, as enforced, provide for the development of a risk management program (RMP) pertaining to Personnel Hazards, is appropriately specific, and fit for purpose without being overly onerous. CS Energy welcomes the ability to provide feedback based on its role with respect to the provision of critical electricity assets.

Specifically, CS Energy supports the following principles being incorporated into the final Rules, based on the key issues identified by CS Energy as requiring resolution:

In summary, CS Energy would like to see provision for an industry sector specific Risk Management Program (RMP) which:

- Recognises the current security settings within the Energy Industry (Industry);
- Incorporates a subset for Electricity Generators;
- Clarifies how Renewable energy generation assets within the Industry are to be dealt with;
- Clarifies the process for the identification of critical workers and how their suitability to access critical components will be assessed;
- Allows for ease of mobility of Industry workers between sites/projects; and
- Provides a more suitable timeframe for both discussion and then subsequent implementation of an Industry RMP (12 months in duration).

¹ Pursuant to the *Security Legislation Amendment (Critical infrastructure protection) Act 2022 (Act)*;

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We would be happy to provide any further information or clarification as required by the Minister and thanks the Minister for her consideration.

Yours sincerely,

Andrew Bills
Chief Executive Officer

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