



1 February 2022

Critical Infrastructure Centre  
Department of Home Affairs  
3-5 National Circuit  
Barton ACT 2600  
Via: [ci.reforms@homeaffairs.gov.au](mailto:ci.reforms@homeaffairs.gov.au)

Dear Sir/Madam

**Exposure Draft Security Legislation Amendment (Critical Infrastructure Protection) Bill 2022**

The Clean Energy Council is pleased to provide a submission to the Department of Home Affairs (**the Department**) on the Exposure Draft Security Legislation Amendment (Critical Infrastructure Protection) Bill 2022 (**the Exposure Draft Bill**).

The Clean Energy Council (**CEC**) is the peak body for the clean energy industry in Australia. We represent and work with over 900 of the leading businesses operating in renewable energy, energy storage and renewable hydrogen. We are committed to accelerating Australia's clean energy transformation.

The clean energy sector recognises the importance of protecting critical infrastructure from security risks and supports the Department's ambition to build the resilience of the electricity sector. As the Department is aware, the Security of Critical Infrastructure framework is new to most of the renewable energy sector due to the significant change to the definition of 'critical electricity asset' to now include almost all generation assets connected to the grid.

Our main concern with the Exposure Draft Bill is the short, six-month period proposed to be allocated for responsible entities to prepare a Risk Management Program. A Risk Management Program is a massive undertaking for responsible entities, and touches on several areas of the business. Furthermore, as seen in the Regulatory Impact Statement estimations in 2021, the costs involved with a Risk Management Program are significant and will be extremely onerous for all entities, let alone smaller generators. We consider the cost of preparing and complying with a Risk Management Program has the potential to change the fundamental business case of smaller projects, impede new investment and ultimately outweigh the net benefits of the Security of Critical Infrastructure framework.

We therefore submit that six months is insufficient to allow for the required forward planning and essential budgeting across the coming financial years. **We request a 12-month delayed commencement for the rules under Part 2A, as a minimum, to allow an appropriate transition period for industry.**

Thank you for again this opportunity to provide feedback on the Exposure Draft Bill and we look forward to working with the Department once the corresponding rules are released.

Please contact Lucinda Tonge at [ltonge@cleanenergycouncil.org.au](mailto:ltonge@cleanenergycouncil.org.au) or on 0432 612 955 should you wish to discuss these matters further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N. Aberle'. The letters are cursive and somewhat stylized, with the first name 'N.' and the last name 'Aberle' written in a single continuous flow.

Nicholas Aberle  
Policy Director, Energy Generation and Storage