



The Australian Industry Group
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24 October 2024

Parliamentary Joint Committee on Intelligence and Security
Parliament House
Canberra

By email: pjcis@aph.gov.au

RE: Cyber Security Bill 2024; Intelligence Services and Other Legislation Amendment (Cyber Security) Bill 2024; Security of Critical Infrastructure and Other Legislation Amendment (Enhanced Response and Prevention) Bill 2024

The Australian Industry Group (Ai Group) welcomes the opportunity to provide feedback on the Cyber Security Legislative Reforms, Intelligence Services and Other Legislation Amendment and the Security of Critical Infrastructure and Other Legislation Amendment.

Ai Group is a peak national employer association representing and connecting thousands of businesses in a variety of industries and sectors across Australia. Our membership and affiliates include private sector employers large and small from more than 60,000 businesses employing over one million staff.

Ai Group welcomes and supports the proposed amendments to the *Security of Critical Infrastructure Act 2018* and the *Intelligence Services Act 2001*. As cyber threats continue to evolve these changes become more important. However, the Government must deepen engagement with industry if these legislative changes are to fully deliver on improving cyber security outcomes for individuals and businesses.

Minimum Cyber Security Standards for Smart Devices

Ai Group welcomes the decision to align new national standards for consumer grade connectable products (or IoT) with international standards making efforts. This will ensure Australia is interoperable with approaches used in our trade partners, allowing Australian businesses to contribute to international standards making, and reducing the regulatory burden on our businesses.

Mandatory Ransomware Reporting for Certain Businesses to Report Ransom Payments

We are pleased to see lower-risk SMEs exempted from ransomware reporting



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obligations. As small businesses do not pose significant systemic cyber risks, they should not be burdened by onerous and disproportionate compliance obligations.

'Limited use' obligations for the National Cyber Security Coordinator and the Australian Signals Directorate (ASD)

Ai Group supports the limited use obligation for information provided to the Australian Signals Directorate and the National Cyber Security Coordinator. When a business is in the midst of managing a cyber incident, they need to be confident that engagement with these entities is confidential and won't lead to further negative impacts. The expansion of assistance the Government can offer a business, who has volunteered information during an incident, must be genuine support a business welcomes in responding to, mitigating and resolving a cyber security incident.

Cyber Incident Review Board

We welcome the establishment of the Cyber Incident Review Board (CIRB), an independent advisory body conducting no-fault, post-incident reviews of significant cyber security incidents in Australia. It is imperative that the board consists of a diverse range of experts with a depth of expertise. As part of its structure the Board must have industry representation – including both vendors and users of cyber security technologies – to ensure comprehensive no-fault reviews be conducted holistically.

Ai Group calls for a balanced approach to cyber security regulation that supports business innovation and minimises compliance burdens, particularly on SMEs who do not pose systemic threat risks and should not be burdened with onerous compliance with which they often do not have the capability to comply.

By ensuring regulation is proportionate and directed the Government can build national security while supporting business growth, innovation and technology adoption rates.

Should you wish to discuss the matters raised in this submission, please feel free to

[Redacted contact information]

Sincerely yours,

[Redacted signature]

Louise McGrath
Head of Industry Development and Policy