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Critical Infrastructure Partnerships and Policy Division
Department of Home Affairs
Canberra ACT

Via email: CI.Strategy.Guidance@homeaffairs.gov.au

Dear Sir/Madam

WOODSIDE SUBMISSION: PROPOSED AMENDMENTS TO THE CRITICAL INFRASTRUCTURE RISK MANAGEMENT PROGRAM RULES FOR HIGH-RISK ASSET CLASSES

Woodside appreciates the opportunity to contribute to the consultation on the proposed amendments to the Critical Infrastructure Risk Management Program (CIRMP) Rules for high-risk asset classes, under the *Security of Critical Infrastructure Act 2018* (SOCI Act). We acknowledge the importance of these amendments in strengthening Australia's security and economic resilience.

As a global leader in the upstream oil and gas industry, Woodside operates significant projects in Australia, including the North West Shelf (NWS) Project Gas Assets, Pluto LNG Project Gas Assets, and the Macedon Gas Project Transmission Pipeline to the Dampier to Bunbury Natural Gas Pipeline (DBNGP), all classified as Critical Infrastructure Assets (CI Assets) under the SOCI Act. In July 2025, Woodside entered into an agreement with ExxonMobil Australia to assume operatorship of the Bass Strait assets in 2026, which will further expand our portfolio of operated CI Assets following completion of the transaction in 2026.

Woodside operates these assets within a robust regulatory framework and places a high priority on effective risk management. It is in this spirit that we offer the following observations as part of the consultation to help ensure the proposed amendments to the CIRMP Rules deliver cost-effective risk mitigation benefits and remain practical for implementation across large, complex organisations like Woodside.

Proposed Additional Supply Chain Hazard Measures

The proposed amendments to the CIRMP Rules include a requirement for entities to establish and maintain a process or system to map their supply chain for major suppliers and critical systems across their physical and cyber supply chains. There is also a proposed requirement to outline supply chain vulnerabilities and mitigating controls and, where possible, include details regarding supplier diversification and redundancy planning. While this objective is understood, meeting the proposed requirements will present several challenges.

In order to develop and maintain multi-tier supply chain visibility, many organisations, including Woodside, would likely be required to enhance their system capability, requiring investment decisions. Establishing and maintaining the level of oversight required to identify and address critical vulnerabilities is resource-intensive and time-consuming and may not achieve the outcome of minimising or eliminating associated risks.

Supply chain mapping beyond the first tier is inherently complex, particularly for organisations like Woodside that engage with global suppliers, often with highly customised, proprietary equipment, each with their own intricate supply chains. Even if such detailed mapping were achieved and interdependencies identified, there may be limited practical options available to mitigate certain risks given the customised nature of the equipment, limiting the advancement of the Department's objectives.

Woodside recognises the benefit of understanding its supply chain. However, based on the information currently available, it is unclear whether the benefits of implementing such complex mapping requirements would equate to actionable risk reduction.

Accordingly, Woodside recommends that this obligation be reconsidered, or at a minimum, further detail be provided to assist organisations in understanding how the proposed requirements would materially improve security and resilience, allowing them to plan for any changes to current requirements in an orderly and efficient manner. In particular, greater clarity is welcomed on how the information would be used to reduce systemic risk, and how entities are expected to address risks beyond their reasonable control.

Proposed Additional Personnel Security Hazard Measures

The consultation paper on the proposed amendments to the CIRMP Rules notes that critical workers often have unescorted and privileged access to the most sensitive systems and components of a CI Asset, placing them in a position to potentially cause severe disruption. The Department proposes mandatory identification of all critical workers and requires onshore critical workers to undergo an AusCheck background check during pre-employment screening, unless they hold an Australian Government security clearance of Negative Vetting 1 or above. Revalidation every five years is also proposed, unless otherwise justified.

The Cyber and Infrastructure Security Centre's Guidance for the Critical Infrastructure Risk Management Program defines critical workers broadly, including employees, interns, contractors and subcontractors who have access to, or control over, critical components of a CI Asset. Their absence or compromise could significantly impact asset functionality. For operators of multiple CI Gas Assets, such as Woodside, this definition encompasses a substantial number of personnel.

Woodside acknowledges the value of robust background checks, such as AusCheck. However, we anticipate significant operational impacts should this proposed requirement be implemented. As a large and complex organisation with both CI Assets and non-CI Assets, Woodside must remain responsive to evolving workforce demands. AusCheck background checks are comprehensive and time-consuming, representing an addition to our current extensive vetting process. Mandating AusCheck checks could impede recruitment, workforce planning and staff mobilisation during periods of high activity and project execution.

Additionally, due to our operation of both CI and non-CI Assets, there is a risk that our current practice of transferring employees between assets, or roles requiring access to multiple assets, may be constrained due to additional vetting requirements. This may also lead to other potential unintended operational consequences. We are, therefore, concerned to ensure that there is a comprehensive understanding of the risks that may be incurred in changing the current background check process before changes are introduced.

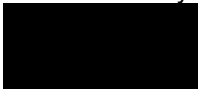
Given the broad definition of critical workers, a uniform, mandatory approach to background checking may reduce operational agility and workforce resilience, both of which are important to the continuity of critical infrastructure. A discretionary, risk-based approach, informed by asset-specific roles and threat profiles, may therefore deliver stronger net security and resilience outcomes. A more refined definition of critical worker would also improve operational clarity.

Conclusion

Woodside appreciates the Department's objectives and the intent underpinning the proposed amendments to the CIRMP Rules. We recognise the importance of managing the risks the subject of these proposed amendments and support ongoing efforts to strengthen the regulatory framework. We have been supportive of the risk-based, non-prescriptive nature of the existing SOCI Act and CIRMP requirements which have allowed a large organisation like Woodside with existing risk management procedures and processes that are already embedded in our operations to readily manage compliance.

However, at this stage, it is challenging to fully quantify the practical and operational implications of the proposed additional requirements. We would welcome the opportunity to continue engaging with the Department to further explore these impacts, including how the proposed amendments operate in practice, while achieving the Department's objective to strengthen security and operational resilience.

Yours sincerely



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