INTERNATIONAL RESILIENCE GROUP

Australian Communications and Media Authority (ACMA)

1. *International Resilience Group* (IRG) is a consultancy firm that provides risk assessments amongst other services to organisations operating across the critical infrastructure sectors, including maritime and aviation.

2. IRG makes this submission in support of a review of the spectrum licensing regime for body scanners, to facilitate their use in high-security settings.

3. Many of our clients operate critical infrastructure assets and are subject to the requirements of the *Security of Critical Infrastructure Act 2018* (Cth) and we have observed a corresponding increase in focus on enhanced physical security measures among these clients.

4. Our understanding is that:

- the current body scanner licensing arrangements permit their use only at airports; and doesn't include new technology wide band body scanners.
- the sole non-airport entity that has been granted a radiocommunications apparatus licence to operate a body scanner is a state police organisation at a single police station.

5. As a result, IRG is unable to recommend or include the body scanner solutions for our clients as part of broader physical security risk mitigation strategies, notwithstanding the important role body scanners play in threat detection and harm minimisation across a range of high-risk environments.

6. The current limitations on body scanner deployment place Australia at odds with comparable international jurisdictions, including the United States and Canada, where body scanners are authorised for use across a wider range of operational contexts.

7. IRG further understands that these jurisdictions permit the deployment of the latest generation body scanner technologies, which are not currently approved for use in Australia.

8. We are continually seeking to recommend advanced, fit-for-purpose technologies that enhance physical security outcomes and meet the evolving risk profiles of our clients.

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9. Accordingly, IRG respectfully requests that ACMA include a review of the body scanner class licence within its work programme for the forthcoming year.

Kind regards,

[redacted]

Graham Manson

Director
International Resilience Group Pty Ltd
[redacted]
W: intresiliencegroup.com.au

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