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To:

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[cyberframework](#)

Subject:

Proposed Changes to the CSF v2.0 Core

Date:

Thursday, June 29, 2023 1:14:54 AM

Dear Sir/Madam

The Australian Financial Markets Association (AFMA) is the leading industry association promoting efficiency, integrity and professionalism in Australia's financial markets, including the capital, credit, derivatives, foreign exchange, energy, carbon, and other specialist markets. Our membership base is comprised of over 125 of Australia's leading financial market participants.

Thank you for the opportunity to provide comments to the National Institute for Standards and Technology's (NIST) Discussion Draft of the Cybersecurity Framework Core 2.0. We commend the continued efforts of NIST to ensure that the next version of the CSF is forward-looking, clear, addresses developments in technology and risk, and improves alignment with national and international cybersecurity standards and practices.

We appreciate that NIST included a "Govern" Function in the next version of the NIST CSF. We know that good governance is critical for cyber risk management, and it helps enable and ensure the success of an organization implementing the other critical functions and associated controls.

Additionally, we commend NIST for addressing supply chain risk management in the CSF 2.0 Core, but we believe NIST could do so more effectively and efficiently for organizations by creating a new Supply Chain Function.

Internationally supply chain risk remains a key focus for industry and regulators.

Sincerely

Damian Jeffree

Damian Jeffree

Senior Director of Policy
Australian Financial Markets Association

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