



The Hon Stuart Robert MP
Minister for the National Disability Insurance Scheme
Minister for Government Services

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The Hon Scott Morrison MP
Prime Minister
Parliament House
CANBERRA ACT 2600

Dear Prime Minister *Scott*

I am writing to provide an update on our work with Apple and Google on their Exposure Notification Framework (ENF) and its relationship to the Australian Government's COVIDSafe contact tracing application.

Our Government's centralised, government-led approach to contact tracing has helped to manage the spread of COVID-19 in Australia. This approach relies heavily on our world-class public health infrastructure and expertise. The introduction of the COVIDSafe app has complemented manual contact tracing conducted by trained health officials. This approach is underpinned by legislation and strong privacy and security controls to assure Australians that their information is being used sensibly and carefully, and only to further public health outcomes.

In the six weeks since its launch, more than 6.2 million Australians have registered for the COVIDSafe app. This represents one of the fastest uptakes of global tracing apps. The Digital Transformation Agency (DTA) continues to improve COVIDSafe's technology and operation, including greater accessibility and improvements to Bluetooth performance. The DTA is continuously investigating technologies that can enhance COVIDSafe, particularly Bluetooth performance.

On 20 May 2020, Apple and Google released the initial version of the ENF. Apple and Google claim that the ENF will improve Bluetooth performance by enabling a device's operating system to natively record close encounters rather than through an app such as COVIDSafe.

The DTA is working to validate this claim through testing of the Bluetooth functionality. Results of this testing are expected in the next week. These results will form one component of an overall decision on whether Australia should adopt the ENF to support our contact tracing efforts.

However, Apple and Google have indicated that the ENF's decentralised contact tracing model can only be adopted in its entirety (that is, the operating model changes must be adopted in addition to any Bluetooth improvements). ENF users are anonymous, meaning that close contacts cannot be identified and contacted by a health official directly. Instead, blanket device-generated notifications are used to alert close contacts to a potential exposure to COVID-19.

The decentralised nature of the ENF limits the ability of health officials to be able to identify outbreak clusters because the initial exposure source remains unknown.

Section 47

Adopting the ENF would mean Australia's proven approach to contact tracing in support of public health outcomes would need to fundamentally change. The ENF removes public health decision making from the sovereign purview of Australia's government and puts it squarely into the hands of two global technology corporations. It limits access for state and territory health officials to effectively manage the pandemic. It would require the Government to amend the underpinning legislation and reintroduce privacy and security risks that have already been addressed.

A change in approach could also seriously erode trust in Government's ability to provide a technology response to COVID-19 as it would be a fundamental scope change in the way that Australia has managed automated contact tracing to date.

The ENF would also significantly reduce our coverage in the Australian community. It provides significantly less device compatibility compared to COVIDSafe and at risk groups, such as elderly users and those from lower socio-economic communities, will be affected most.

All accumulated 'close contact' data on user phones would be lost, creating an additional vulnerability in our efforts to contain COVID-19 in Australia. We risk losing much of what we have gained through our quick and deliberate actions, just as we are easing restrictions for Australians.

For these reasons, I consider that adopting the ENF model in its entirety is unacceptable to Australia, even if testing results show an improvement in Bluetooth functionality.

Australia is not alone in this regard. Other countries that have implemented sovereign technology to help solve tracing challenges associated with COVID-19 are in the same position.

As foreshadowed with your office, I propose to chair an international Ministerial-level meeting in the coming weeks to reach a joint position in response to the Apple and Google ENF. It will include a selection of countries who, alongside Australia, were first movers in implementing sovereign digital responses to COVID-19.

The aim of the meeting is to achieve a consensus decision to require that Apple and Google decouple the Bluetooth performance improvements from the overall ENF operating model to allow it to be harnessed within the sovereign approaches and tracing capabilities developed by individual jurisdictions. The countries I propose to meet with are

Section 33

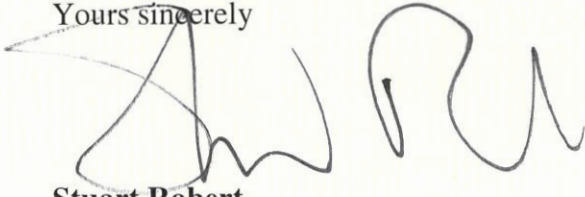
Section 33

If successful, this would allow Australia, along with other countries, to leverage the technology benefits Apple and Google have proposed within the existing approaches, while still enabling the ENF model to operate in jurisdictions that do not have an existing contact tracing solution.

I will provide an update on the results of testing and the outcomes of the Ministerial meeting in the coming weeks.

I am confident these actions will help us to continue to manage Australia's response to COVID-19 and provide the best contact tracing solution for Australians.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stuart Robert', written over the typed name below.

Stuart Robert

CC: The Hon Greg Hunt MP, Minister for Health and The Hon Marise Payne, Minister for Foreign Affairs

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