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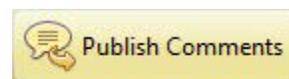


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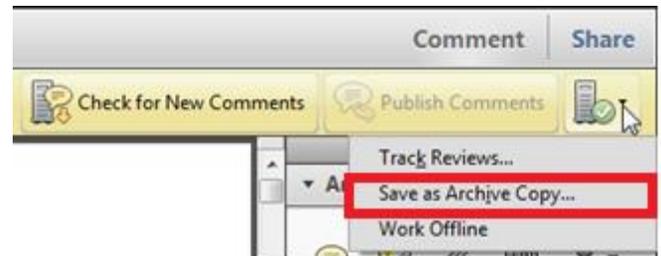
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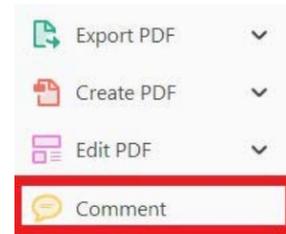
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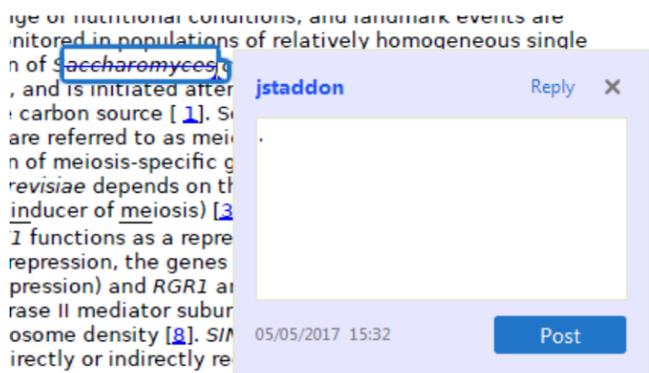


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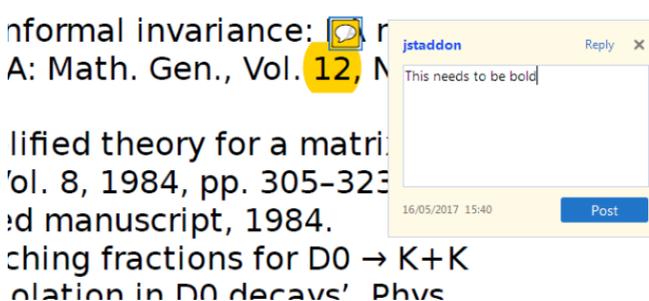
1. Small size (35-250 amino acids).
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3. Absence of functional data which could not be the real overlapping gene.
4. Greater than 25% overlap at the N-terminus with another coding feature; over both ends; or ORF containing a tRNA.

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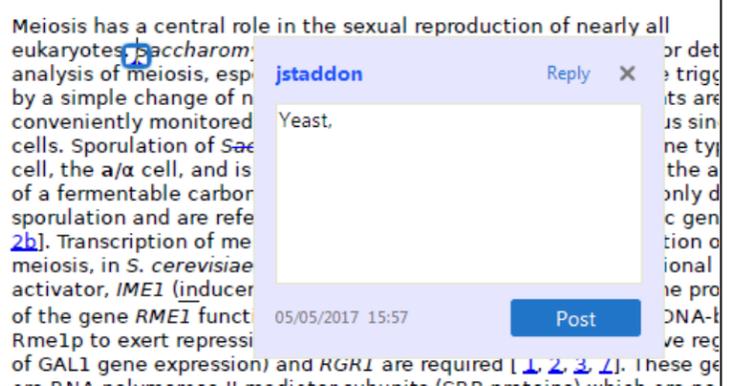


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- Select the file to be attached from your computer or network.
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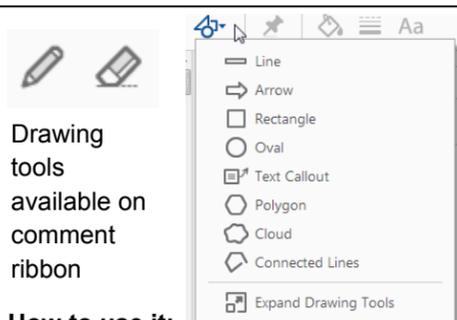
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of the business cycle, starting with the
on perfect competition, constant ret
production. In this environment goods
extra costs should be set to zero for the
he market. The model is determined by the model. The New-Key
otaki (1987), has introduced produc
general equilibrium models with nomin
and real variables. Most of this literat

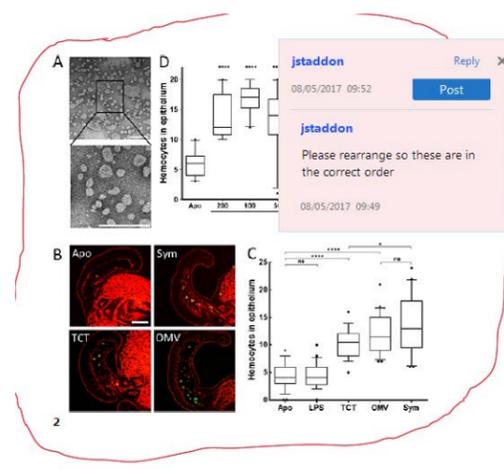


How to use it:

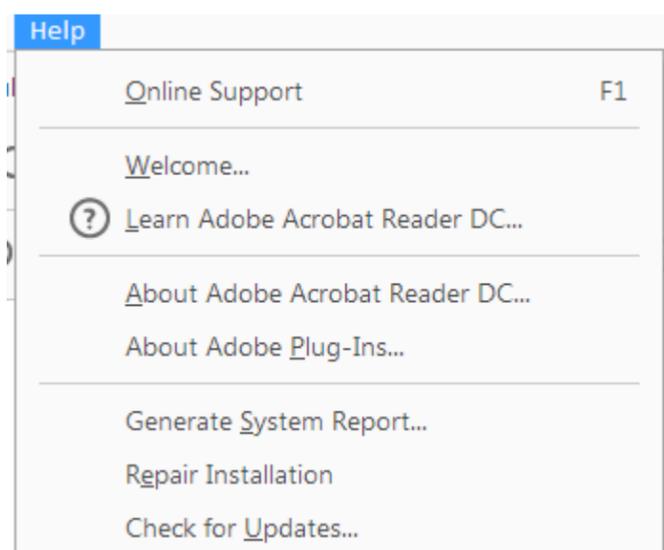
- Click on one of the shapes in the **Drawing Markups** section.
- Click on the proof at the relevant point and draw the selected shape with the cursor.
- To add a comment to the drawn shape, right-click on shape and select *Open Pop-up Note*.
- Type any text in the red box that appears.

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AQ7	AUTHOR: Please confirm whether the following references “AWWA (2014), AWWA (2015), Clapper (2012), Fisher (2014), HSPD-7 (2002), Lipton et al. (2016), Russian Hackers (2016), Stack 8 (2015), and NGA (2015).” are OK as typeset.	
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FundRef name	FundRef Organization Name
Idaho National Laboratory	[NOT FOUND IN FUNDREF REGISTRY] 

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1 Protecting water and wastewater utilities from cyber-physical 2 threats

AQ10 3 Robert M. Clark ¹, Simon Hakim² & Srinivas Panguluri³

AQ2 4 ¹Environmental Engineering and Public Health Consultant, Cincinnati, OH, USA; ²Professor of Economics, and Director of the Center for Competitive
5 Government at the Fox School, Temple University, Philadelphia, PA, USA; and ³CB&I Federal Services LLC, Cincinnati, OH, USA

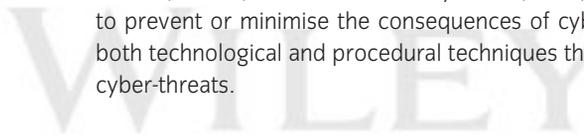
7 Keywords

8 drinking water; environmental assessment;
9 wastewater treatment; water quality; water
10 supply. 

AQ3

Abstract

Recent events have highlighted the need to address cybersecurity threats to systems supporting critical infrastructure and federal information systems are evolving and growing. These threats have become ubiquitous in the United States, and throughout the world. Many information and communications technology (ICT) devices and other components are interdependent so that disruption of one component may have a negative, cascading effect on others. In the United States, the Federal role in cyber-security has been debated for more than a decade but creating a policy is complicated because in the United States, State and local governments are the major institutions responsible for providing services to their populations. It is that critical infrastructure such as Publically Owned Treatment Works (POTWs) and Public Water Systems (PWSs) adopt suitable countermeasures to prevent or minimise the consequences of cyber-attacks. This paper discusses both technological and procedural techniques that can be used to protect against cyber-threats.



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AQ4 10 Introduction

11 In a recent issue of the New York Times, David Lipton and his
12 colleagues reported that Russian Intelligence had 'hacked' the
13 Democratic National Committee in an attempt to influence
14 the US Presidential Election (Lipton *et al.* 2016). Clearly, chal-
15 lenges related to cyber-security have the potential for becom-
16 ing one of the most significant issues in the 21st century. In
17 2009, Barack Obama, President of the United States (US)
18 declared cyber threats to be among 'the most serious eco-
19 nomic and national security challenges we face as a nation'
20 and stated that 'America's economic prosperity in the 21st
21 century will depend on cyber-security (Obama 2009)'. In
22 January 2012, the US Director of National Intelligence testified
23 before the Subcommittee on Oversight, Investigations, and
24 Management, Committee on Homeland Security, House of
25 Representatives that cyber threats pose a critical national and
26 economic security concern (Clapper 2012). To further high-
27 light the importance of these threats, on October 11, 2012,
28 the US Secretary of Defense stated that the collective result of
29 attacks on our nation's critical infrastructure (CI) could be 'a
30 cyber-Pearl Harbor; an attack that would cause physical
31 destruction and the loss of life (Panetta 2012)'. According to a
32 2013 report issued by the US General Accountability Office
33 (GAO), cybersecurity threats to systems supporting CI and

34 federal information systems are evolving and growing (US
35 GAO 2013). In addition, the US GAO conducted a number of
36 other studies attempting to highlight and document US
37 vulnerability to cyber-threats. These concerns apply to
38 governments throughout the world.

39 A critical aspect of cybersecurity is the need to protect CI.
40 In an attempt to enhance and improve the security and resil-
41 iency of US CI through voluntary, and collaborative efforts,
42 in February 2013, the US President issued Executive Order
43 13636 (Fischer *et al.* 2013). The order expanded an existing
44 Department of Homeland Security (DHS) program for infor-
45 mation; sharing and collaboration between the government
46 and the private sector by:

- 47 • Developing a process for identifying CI that have a high
48 priority for protection;
- 49 • Requiring the National Institute of Standards and Technol-
50 ogy (NIST) to develop a Cybersecurity Framework of stand-
51 ards and best practices for protecting CI; and
- 52 • Requiring regulatory agencies to determine the adequacy
53 of current requirements and their authority to establish
54 requirements to address the risks.

55 Cyber-threats to US infrastructure, and other assets, are
56 of growing concern to policymakers. These threats have
57 become ubiquitous in the United States and are troublesome

58 because many information and communications technology
 59 (ICT) devices and other components are interdependent.
 60 Therefore, disruption of one component may have a nega-
 61 tive, cascading effect on others. Cyber-attacks might include
 62 denial of service, theft or manipulation of data. Damage to CI
 63 through a cyber-attack could have a significant impact on
 64 national security, the economy, and the livelihood and safety
 65 of citizens. It is clear that cyber-security issues include not
 66 only the threats associated with information technology but
 67 also involve physical threats to CI.

68 Even though cyber-threats pose a major threat to CI, in
 69 the United States, the Federal role in cyber-security has
 70 been debated for more than a decade. Action at the Federal
 71 level for protecting CI is limited because of the political struc-
 72 ture of the United States. In the United States, State and local
 73 governments have been the major institutions responsible
 74 for providing services to their populations. However, the US
 75 Constitution provides for a separation of powers between
 76 the States and the Federal government. In order to bridge
 77 this gap, the National Governors Association (NGA 2015), a
 78 non-partisan organisation representing the interests of the
 79 fifty states and trust territories, has begun taking action in
 80 this important area (NGA 2015). Governments in countries
 81 that do not have the political separation of power that exists
 82 in the United States, may therefore be able to adopt a more
 83 integrated approach to cyber-security (Tabansky 2016).

84 From a public health and an economic perspective, public
 85 water supply (PWS) and wastewater systems represent a CI
 86 that needs protection. After September 11, 2001, the federal
 87 government directed efforts to secure the nation's CI and
 88 initiated programs such as the National Strategy to Secure
 89 Cyberspace (Bush 2003). This program addresses the vulner-
 90 abilities of Supervisory Control and Data Acquisition (SCADA)
 91 systems and Information Control Systems (ICSs) and calls for
 92 the public and private sectors to work together to foster
 93 trusted control systems (Dakin *et al.* 2009; Edwards 2010).
 94 This paper discusses the vulnerability of water supply and
 95 wastewater to cyber-threats and suggests actions for deal-
 96 ing with these threats.

97 **Cyber-security challenges in the**
 98 **United States**

99 The US GAO has conducted a number of comprehensive
 100 studies on the vulnerability of US governmental and societal
 101 functions to cyber-threats. According to these studies
 102 advanced persistent threats (APTs) pose increasing risks in
 103 the United States and throughout the world (US GAO 2011).
 104 APTs occur where adversaries possess sophisticated levels
 105 of expertise and significant resources to pursue their
 106 objectives repeatedly over an extended period of time.
 107 Some of these adversaries may be foreign militaries or
 108 organized international crime. Growing and evolving threats

can potentially affect all segments of society, including indi- 109
 viduals, private businesses, government agencies and other 110
 entities. 111

National threats to security include those aimed against 112
 governmental systems and networks including military 113
 systems, as well as against private companies that support 114
 government activities or control CI (US GAO 2011). Cyber- 115
 threats may target commerce and intellectual property. 116
 These threats may include obtaining confidential intellectual 117
 property of private companies and governments, or individ- 118
 uals with the objective of using that intellectual property for 119
 economic gain. Threats to individuals could lead to the unau- 120
 thorised disclosure of personally identifiable information, 121
 such as taxpayer data, Social Security numbers, credit and 122
 debit card information or medical records. The disclosure of 123
 such information could cause harm to individuals, including 124
 identity theft, financial loss and embarrassment. 125

Cyber-attacks can result in the loss of sensitive informa- 126
 tion and damage to economic and national security, the loss 127
 of privacy, identity theft or the compromise of proprietary 128
 information or intellectual property. According to the US 129
 Computer Emergency Readiness Team (US-CERT), over this 130
 period, the incidents have increased from 5 503 to 48 562; 131
 an increase of 782% (US GAO 2013). 132

The following examples illustrate the potential for 133
 attacking CI in the United States: 134

- In Eastern Ukraine in late December, 2015 power was cut 135
 to more than 600 000 homes and Russia was identified as 136
 the likely source of the attack. Ukraine's security service and 137
 the Ukraine government blamed Russia for the attack. The 138
 US including experts at the CIA, National Security Agency 139
 and the DHS are investigating whether samples of malware 140
 recovered from the company's network indicate that the 141
 blackout was caused by hacking and whether it can be 142
 traced back to Russia. Researchers from a private global 143
 security company claimed they had samples of the malicious 144
 code that affected three of the region's power companies, 145
 causing 'destructive events'. The group behind the attack 146
 has been identified as the 'the Sandworm gang', which is 147
 believed to have targeted NATO, Ukraine, Poland and 148
 European industries in 2014 (Russian Hackers 2016). 149
- A city within the Australian state of Queensland found that 150
 a computer rejected for a job with local government decided 151
 to seek revenge by hacking into the city's wastewater 152
 management system. During a 2-month period, he directed 153
 computers to spill hundreds of thousands of gallons of raw 154
 sewage into local rivers, parks, and public areas before 155
 authorities were able to identify him as the perpetrator 156
 (Janke *et al.* 2014). 157
- A major cyber-security problem occurred in the City of 158
 Bacon Raton, Florida, a medium sized water and wastewater 159
 facility. The utility experienced a series of cyber-security 160

AQ5

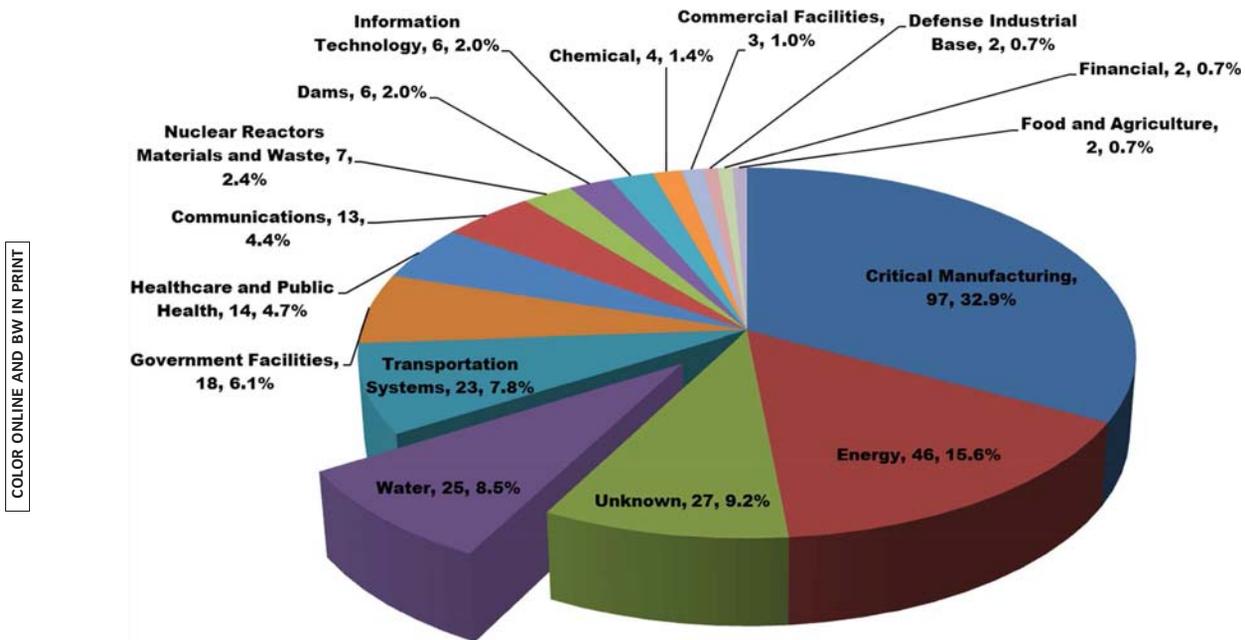


Fig. 1. 2015 Cybersecurity incidents reported by sector (DHS 2016). [Colour figure can be viewed at wileyonlinelibrary.com]

161 incidents resulting in plant shutdowns. Eventually the SCADA
 162 system locked-up and caused the water plant to shut down
 163 and it took 8 h to re-establish control of the system. There
 164 was no monitoring system for the network traffic so it was
 165 difficult to diagnose the source of the problem. Ultimately it
 166 was concluded that the network had experienced a data
 167 storm. Eventually the utility was able to update the SCADA
 168 system without losing any of the systems functionality (Horta
 169 2007).

170 **Protecting water and wastewater**
 171 **systems in the United States**

172 SCADA/ICS systems are an essential component for the
 173 effective operation of most water and wastewater utilities in
 174 the US Homeland Security Presidential Directive 7 (HSPD-7
 175 2002) and its successor, the Presidential Policy Directive
 176 issued in 2013 (PPD-21 2013). The Water Sector has been
 177 identified as one of the 16 CI sectors that must be protected.

F1 178 Figure 1 shows that, in 2015, the DHS responded to 245
 179 incidents. The Water sector reported the fourth largest num-
 180 ber of incidents resulting in DHS incident response support
 181 (DHS 2016). The Energy sector reported the second largest
 182 number of reported incidents. Clearly these incidents could
 183 have a direct impact on water supply systems.

184 The US Environmental Protection Agency (EPA), is the
 185 sector-specific agency lead for protecting the CI in the Water
 186 Sector. EPA works collaboratively with the DHS, utility
 187 owners and operators and representatives from industry

188 associations to ensure that cyber-protection and resilience
 189 strategies are effective and practical (EO 13636 2016). EPA
 190 has determined that current cybersecurity regulatory
 191 requirements in the Water Sector are sufficient and contem-
 192 plates no regulatory action.

193 Sector-specific partners include: the EPA, DHS, the
 194 National Institute for Science and Technology (NIST), the
 195 American Water Works Association (AWWA), the Water
 196 Research Foundation, the Water Environment Research
 197 Foundation and other water associations, educational
 198 institutions, national research laboratories, public and
 199 private research foundations, states/local agencies, PWSs
 200 and related organizations.

201 The water utility industry has been active in a number of
 202 ways to improve cyber-security in the industry. For example,
 203 the Virginia Department of Health in collaboration with
 204 USEPA Region 3 has undertaken an evaluation of cyber-
 205 security practices in 24 utilities of varying size and charac-
 206 teristics (Manalo *et al.* 2015). In California various water districts
 207 have formed a committee to take the lead in promoting
 208 awareness of cyber-security throughout the State's public
 209 water utilities (Johnson & Edwards 2007).

210 For example, in an effort to provide PWSs with more
 211 actionable information on cybersecurity, AWWA has
 212 released the Process Control System Security Guidance for
 213 the Water Sector (AWWA 2014) and a supporting Use-Case
 214 Tool (Roberson & Morley 2014). The goal of AWWA's
 215 guidance is to provide water sector utility owners/operators
 216 with a consistent and repeatable course of action to reduce

217 vulnerabilities to cyber-attacks as recommended by the
 218 American National Standards Institute (ANSI)/AWWA G430
 219 and the Executive Order 13636 (EO 13636 2016).

220 The ANSI/AWWA G430 (AWWA 2015) standard defines the
 221 minimum requirements for a protective security program for
 222 the Water Sector. The standard promotes the protection of
 223 employee safety, public health, public safety and public
 224 confidence. This standard is one of several in the AWWA
 225 Utility Management series designed to cover the principal
 226 activities of a typical public water system. This AWWA
 227 standard has received the SAFETY Act designation from the
 228 DHS in February 2012.

229 The G430 standard applies to all water and wastewater
 230 systems regardless of size, location, ownership or regulatory
 231 status. This standard build on the long-standing drinking
 232 water sector practice of using a 'multiple barrier approach'
 233 to protect public health and safety. The requirements of this
 234 standard support a utility-specific security program and are
 235 expected to result in consistent and measurable outcomes.
 236 They address the full spectrum of risk management including
 237 organisational commitment, physical and cyber-security and
 238 emergency preparedness.

239 **Common vulnerabilities in the water supply**
 240 **industry**

241 Historically, business and SCADA networks were separate.
 242 Even if a utility owner recognised the value of integrating
 243 SCADA data into their strategic decision-making support
 244 systems, limitations in network topologies made integration
 245 difficult. Older SCADA systems relied heavily on serial
 246 connectivity and very low frequency radio communications
 247 that could provide enhanced range and partial line-of-sight
 248 connectivity, none of which supported standard internet
 249 protocol (IP) connectivity desired by business networks (Pan-
 250 gulari *et al.* 2011). This virtual isolation has led to a false
 251 sense of security by many SCADA system administrators.
 252 Increasingly, however, SCADA and business networks of
 253 most medium-to large-scale PWSs are inter-connected to
 254 provide integrated operation. If such integration is not
 255 secured, it will generally lead to greater vulnerability; this is
 256 very important to the water sector because it is thought to
 257 lag behind most other CIs in securing its control systems
 258 (Baker *et al.* 2010; Weiss 2014). The top five areas of
 259 common security gaps in water supply are: (1) network con-
 260 figurations, (2) media protection, (3) remote access, (4) docu-
 261 mented policies and procedures, and (5) trained staff.

262 A hacker, depending on motive and objectives, may try to
 263 extract information (data) to further develop attacks or sell
 264 the information for gain. In terms of water systems, an
 265 objective may be to cause public distrust or fear, the hacker
 266 may attempt to deny access to the system and/or destroy
 267 equipment. Hackers will often change files to cover their

268 tracks to be undetectable. Cyber-impacts may also have pro-
 269 cess impacts depending on the process and system design.
 270 For instance, if attackers change database parameters in the
 271 real-time database (impacts system integrity), they could
 272 turn on pumps potentially causing a tank to overflow as illus-
 273 trated by the successful attack against the wastewater treat-
 274 ment plant in the Maroochy Shire in Queensland, Australia
 275 (Panguluri *et al.* 2004; Janke *et al.* 2014; Weiss 2014).

Protecting drinking water systems

Creating a cybersecurity culture

278 Many water managers are unfamiliar with information tech-
 279 nology (IT) and SCADA/ICS technology, much less cyber-
 280 security defences. Therefore, they must depend on their
 281 technical staff. However, there are steps that utility manag-
 282 ers can take to secure their systems against cyber-attacks
 283 (Clark & Hakim 2016; Panguluri *et al.* 2016). Fisher (2014) lists
 284 an eight-stage process for creating major change:

- Establishing a sense of urgency by identifying the potential
 285 crises. 286
- Creating the guiding coalition by putting together a group
 287 with the power to lead change. 288
- Developing a vision and strategy including policies and
 289 procedures to define and enforce security. 290
- Communicating the change vision. 291
- Empowering broad-based action. 292
- Generating short-term wins. 293
- Consolidating gains and producing more change. 294
- Anchoring new approaches in the emergent culture. 295

296 Establishing a cyber-security culture is the framework for
 297 implementing a strong defensive program. It puts the three
 298 legs of cyber-security on a firm foundation, namely, technol-
 299 ogy, people and physical protection. The last of these items
 300 implies locating IT equipment in a safe location.

Secured network design

301 It has been traditional for industrial control systems to apply
 302 standard IT security systems to control networks, including
 303 physical security, personnel security and ICS network perim-
 304 eter protections including firewalls and network intrusion
 305 detection systems (NIDS). However, a Ponemon Institute
 306 study (Ponemon Institute LLC 2013) found that malicious
 307 cyber breaches took an average of 80 days to detect, and
 308 123 days to resolve. An example of a technological approach
 309 that may protect an ICS is a unidirectional gateway.
 310 Therefore, many experts recommend that technological
 311 innovations such as unidirectional gateways be used as the
 312 modern alternative to firewall perimeter protections for ICSs
 313 (Waterfall 2016). Figure 2 illustrates a unidirectional gateway
 314 F2 deployment. All unidirectional gateways are combinations of
 315

COLOR ONLINE AND BW IN PRINT

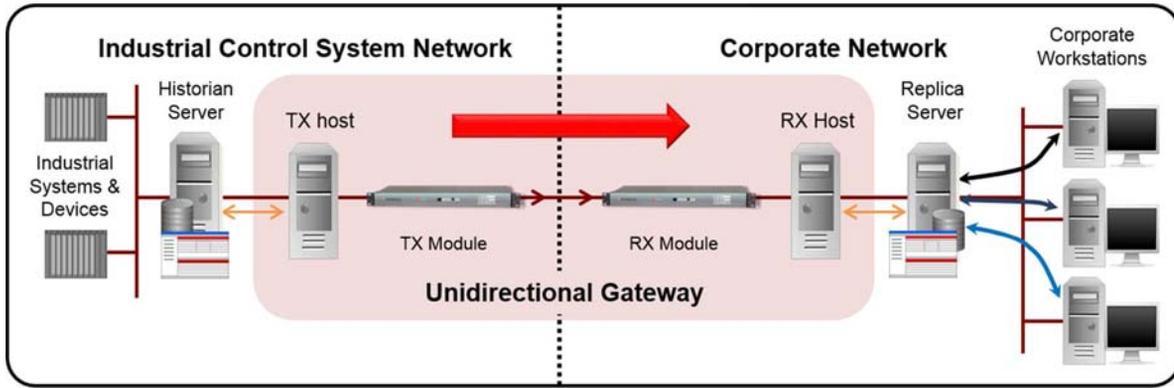


Fig. 2. Example of a unidirectional network (Ginter 2016). [Colour figure can be viewed at wileyonlinelibrary.com]

316 hardware and software as shown below. A possible
317 approach is a unidirectional gateway which results in a system
318 able to transmit information from a protected individual
319 network, but physically unable to transmit any information
320 back to that protected network from outside the system.

321 In cases where a unidirectional gateway is unaffordable
322 (e.g., in smaller-sized utilities) or is technically challenging
323 to implement, utilities should investigate other alternatives such
324 as implementing virtual routing and forwarding (VRF) (Stack 8
325 2015). VRF technology is included with some off-the-shelf
326 routers that allow different routing tables to work simultane-
327 ously within a given router. Devices using the different routing
328 tables are virtually isolated, unable to communicate with each
329 other even though they are connected to the same hardware.
330 This allows network paths to be virtually segmented without

using multiple devices. Internet service providers often take
331 advantage of VRF functionality to create separate virtual private
332 networks (VPNs) for customers. This technology is also
333 referred to as VPN routing and forwarding.
334

335 Cybersecurity designs should strive to limit access or
336 incorporate isolation capabilities of ICS/SCADA systems. The
337 isolation of an ICS system can be achieved by establishing
338 security enclaves (or zones) with virtual local area networks
339 (VLANs) or subnets that are segregated from lower security
340 zones like corporate networks or any Internet accessible
341 zones. Information passing from one security zone to
342 another should be monitored. Figure 3 illustrates an
343 example of a secure PWS architecture.

344 In this example, the ICS environment has been isolated
345 with no ingress electronic connections. The use of data

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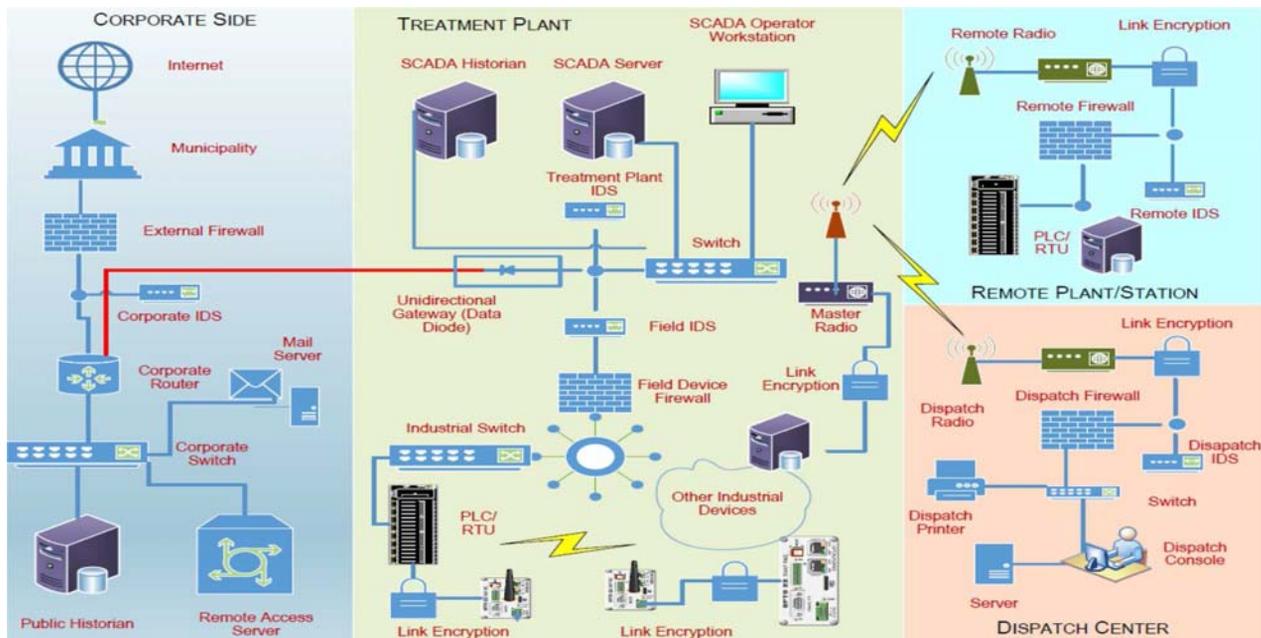


Fig. 3. Secure PWS architecture example (Panguluri et al. 2016). [Colour figure can be viewed at wileyonlinelibrary.com]

346 diodes between the SCADA/ICS (process control) and corpo- 399
 347 rate (business analytics, payroll, accounting, email, etc.) IT 400
 348 environments allows for information sharing from the ICS 401
 349 environment through a truly one-way transfer of data from 402
 350 ICS historians (databases) for business needs and reporting. 403

351 The use of true isolation through data-diode technologies 404
 352 between the treatment plant ICS and the corporate environ- 405
 353 ment (Fig. 3) is more recent. The adoption of this technology 406
 354 within the water sector has been observed by the authors at 407
 355 one utility but is gaining increasing acceptance within the 408
 356 water sector. Some PWSs have identified the use of this tech- 409
 357 nology in their advance security posture planning docu- 410
 358 ments. However, the implementation of this technology 411
 359 requires an investment in both capital and labour. At least 412
 360 two full-time-equivalent (FTE) technology staff are typically
 361 required for several months during the development, test-
 362 ing, verification and deployment phases. Additionally,
 363 depending upon the complexity of the architecture, a suc-
 364 cessful deployment may require three or more FTEs. After
 365 the full implementation and optimisation of the secure PWS
 366 architecture, at least 1/4 to 1/2 FTE will be necessary to
 367 manage and support this type of security posture. Based on
 368 current water sector cybersecurity implementation and exe-
 369 cution costs, it is estimated that this technology implementa-
 370 tion (depending on the features) would average around
 371 \$300 000 for initial implementation and optimisation.

372 The application of secure architecture and isolation of the 422
 373 ICS environment prevents both remote access connection 423
 374 and unauthorised computers or network devices including 424
 375 third party vendors from entering into the ICS environment. 425
 376 Furthermore, the utility will also need to address the issue of 426
 377 securely installing patches, anti-virus signature files and 427
 378 application updates. These approaches typically involve the 428
 379 use of portable media (USB memory and USB hard drives) 429
 380 which present security concerns. By deploying unidirec-
 381 tional gateways (based on data Diode technology) the cyber
 382 risk of compromise from external networks, like the internet,
 383 is significantly reduced if not eliminated. However, trusted
 384 insiders, portable media, and physical intrusions still present
 385 a potential vector into the system. Therefore, a strong media
 386 protection policy, as well as strong physical controls needs
 387 to be developed to maintain the integrity of the environ-
 388 ment. Prior to adding a network device or computer to the
 389 ICS environment, a thorough analysis should be conducted.
 390 Once approved, the equipment should stay at a secure
 391 off-site location for future use and identified as an ICS
 392 component.

393 The suggested architecture along with strong policies and 444
 394 procedures is necessary in order to develop a security cul- 445
 395 ture that raises the level of awareness of each employee. 446
 396 Management should provide all necessary training for the 447
 397 core cybersecurity staff. The next stage in security is to 448
 398 monitor and verify that the security controls are working as 449

designed through monitoring and log-file analysis. Systems, 399
 applications and security components should enable log- 400
 ging. This capability should be centrally located through a 401
 security information and event management system to allow 402
 central management of monitoring appliances. It should 403
 include log-reviews and alerting capabilities in the event that 404
 the system starts to identify anomalies with the systems for 405
 early detection, alerting and recovery capabilities. 406

407 Finally, when excessing or decommissioning equipment, 407
 408 a proper equipment disposal process should be in place 408
 409 to ensure no proprietary information ever leaves the 409
 410 environment. A proper disposal process protects from mali- 410
 411 cious reverse engineering, discovery and reconnaissance 411
 412 activities. 412

Summary and conclusions 413

414 As infrastructure becomes increasingly connected, cyber- 414
 415 physical security in CI such as water supply will become an 415
 416 even greater concern. In the United States, cyber-security 416
 417 issues are extremely important from a national security per- 417
 418 spective (US GAO 2013); however, there is a strong desire 418
 419 for the separation of powers between the Federal govern- 419
 420 ment and the individual States that has made developing a 420
 421 unified cyber-security strategy difficult. 421

422 It is clear that cyber threats to the water sector are real. 422
 423 The insider attack on the Maroochy Shire wastewater treat- 423
 424 ment plant provides an insight into the real consequences of 424
 425 a specific attack and there have been confirmed cases 425
 426 of cyber-attacks against domestic water utilities. Such 426
 427 attacks could affect public health and increase distrust of 427
 428 government, by delivering contaminated water that could 428
 429 potentially cause sickness without detection. 429

430 In the United States virtually all drinking water utilities, 430
 431 even subdivision-sized systems, have become dependent on 431
 432 SCADA systems. It is therefore imperative that PWSs adopt 432
 433 suitable countermeasures to prevent or minimise the 433
 434 consequences of cyber-attacks. Establishing a strong cyber- 434
 435 security environment is the basis for implementing a strong 435
 436 cyber-defence. Such a program should consist of technol- 436
 437 ogy, people and physical protection, where the last refers to 437
 438 physical protection of cyber-devices from physical tamper- 438
 439 ing. It is also critical that utility management create and sup- 439
 440 port a cyber-security culture. The lack of policies and 440
 441 procedures may pose a significant barrier to developing 441
 442 adequate cyber-security; if management support is lacking, 442
 443 there will never be an effective cyber-security culture. 443

444 Utilities in the United States should avail themselves of 444
 445 the free opportunities available through the US DHS to 445
 446 train their staff and allocate necessary funding to achieve 446
 447 improvements in cybersecurity. The greatest challenge for 447
 448 the water industry is the large variance in system size, 448
 449 staffing, and resources available to the individual utilities. 449

450 Utilities should adopt countermeasures that best meet their
AQ6 451 security and organisational requirements.

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