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Defence's air gapped cloud deed with Google Australia: what the record names, and what it keeps confidential

Version 1.0, dated on its cover. This assessment reads the Department of Defence's announcement of 19 December 2025 of a Deed of Standing Offer with Google Australia Pty Ltd [DSE-1] beside the public record around it, and adjudicates nothing. It does not say who operates the capability the deed is for, what any word in the announcement means beyond what the announcement says, what legal effect any design has, or who can compel any entity. It reports what the record names, what it does not, and what would settle the question the record leaves open. Every artefact is pinned by SHA-256 in this case's retrieval logs or in the register of the case named beside it.

The limit that bounds every sentence below. The record names the entity [DSE-1, DSE-16]. Defence's announcement names Google Australia Pty Ltd as the party to the deed [DSE-1], and Defence's own imagery of the signing names the same company [DSE-16]. The record does not publish how the capability is operated: the announcement states that "Due to sensitivities surrounding this capability, Defence will refrain from providing further commentary on the Deed of Standing Offer, with all specific details remaining strictly confidential." [DSE-1]. Every question after the entity stops there, and every statement below that something is absent is a statement about the documents this practice holds.

Scope

What is assessed. Defence's media release of 19 December 2025 [DSE-1] and Defence's imagery of the signing [DSE-16]; the counterparty's entry on ASIC's register [H-600-1] and its holding company's annual report [S1]; Defence's contract notices under the counterparty's ABN in the AusTender OCDS data from 1 January 2023 to 3 October 2026 [DSE-OCDS], and AusTender's contract notice and standing offer notice searches [DSE-14, DSE-S0N-1, DSE-S0N-2]; the Hosting Certification Framework's register [DSE-9]; the media releases of the Defence portfolio's ministers from 1 December 2025 to 31 March 2026 [DSE-M-001 to DSE-M-044]; the Senate Foreign Affairs, Defence and Trade Legislation Committee's Estimates hearings of 3 June 2026, in the Proof Committee Hansard [DSE-H-5], and of 11 February 2026, in the Official Committee Hansard [DSE-H-6]; Google's published pages on Google Distributed Cloud air-gapped [DSE-6, DSE-10, DSE-13, DSE-17]; the United States statute at 18 U.S.C. § 2713 [S7]; and the press reports that describe the capability, as claims [DSE-2, DSE-4, DSE-5].

What is not assessed. The deed, which is not published [DSE-1]. Whether the capability is Google Distributed Cloud air-gapped, which is not established.

1 The statement

The deed. The release reads: "Defence has signed a multi-year Deed of Standing Offer (the Deed) with Google Australia Pty Ltd (Google Australia) to deliver enhanced, secure and air-gapped hyperscale cloud capability for Defence's ICT Environment." [DSE-1]. It continues: "This Deed will support Defence's transition to modern cloud-based infrastructure under projects DEF 2222 and JP 9III." [DSE-1]. The release is dated 19 December 2025 [DSE-1].

Terms in the release. The release says “Defence will have access to advanced global cloud solutions to deliver key sovereign capabilities.” [DSE-1], and that the technology will support faster rollout and cooperation “while ensuring Australia retains control of critical Defence assets.” [DSE-1]. No sentence of the release defines “sovereign” or “control” [DSE-1].

What the release does not say. Terms used in later press reports [DSE-2, DSE-4, DSE-5], namely “Defence Secret Environment”, “Secret” and “sovereign control”, do not appear in the release [DSE-1]. Nor does “Google Cloud” [DSE-1]. The release names no operator and states no value, location or security classification [DSE-1].

The signing imagery. The release directs media to imagery series S20253872 [DSE-1]. That series is titled “Deed of Standing Offer with Google Australia” and its caption reads “Representatives from Defence and Google Australia Pty Ltd following the signing of a multi-year Deed of Standing Offer which will deliver enhanced, secure and air-gapped hyperscale cloud capability for Defence’s ICT Environment.” [DSE-16].

2 The record

The counterparty. ASIC’s register prints GOOGLE AUSTRALIA PTY LTD, ACN 102 417 032, ABN 33102417032, status Registered [H-600-1]. It names the Ultimate Holding Company as “ALPHABET INC.” and records GOOGLE INTERNATIONAL LLC as a member [H-600-1]. Alphabet Inc. reports itself incorporated in Delaware [S1].

Defence’s contract notices under that ABN. The AusTender OCDS data for contract notices published from 1 January 2023 to 3 October 2026 holds six Department of Defence notices, in seven releases, whose supplier carries ABN 33102417032 [DSE-OCDS]. As listed in that data, by notice, publication date (UTC), description and value in Australian dollars [DSE-OCDS]:

Notice	Published	Description	Value (AUD)
CN4166629	2025-07-03	Software Licence Renewal	\$859,281.69
CN4214888	2026-01-22	CRNo1/2026	\$543,150.00
CN4214888-A1	2026-07-10	CRNo1/2026	\$0.02
CN4220355	2026-02-19	Incubation Platform	\$700,000.00
CN4236907	2026-05-04	Application Development	\$10,818.46
CN4259876	2026-07-09	Software Services	\$609,780.60
CN4267881	2026-08-10	Incubator Cloud Platform Service Consumption	\$136,000.00

A1 denotes an amendment notice; values are as recorded in the OCDS data [DSE-0CDS].

The OCDS data holds no Defence contract notice whose title or description carries “google”, “distributed cloud”, “air-gapped”, “secret environment” or “DSE”, whatever its supplier [DSE-0CDS]. This assessment makes no finding on whether any notice was required to be published.

Standing offer notices. A search of AusTender standing offer notices by Google Australia Pty Ltd’s ABN and by the supplier name “Google”, for 1 December 2025 to 3 October 2026, returned no results [DSE-S0N-1, DSE-S0N-2].

The Hosting Certification Framework. The register’s one Google entry is “Google Australia - Cloud Service offering (Google Cloud Platform - Australian Regions)”, under “Service Provider and Certified Strategic Service” [DSE-9]. No entry names an air-gapped Google offering [DSE-9]. This assessment does not establish whether the register covers classified deployments.

Ministerial releases. None of the 44 media releases of the Defence portfolio’s ministers from 1 December 2025 to 31 March 2026 carries “Google”, “secret environment”, “DSE”, “air-gapped”, “hyperscale”, “DEF 2222”, “JP 9III”, “secret” or “deed of standing offer” [DSE-M-001 to DSE-M-044].

The Senate Estimates hearing of 3 June 2026. The transcript does not record the deed being raised [DSE-H-5]. “Google” occurs four times, at printed pages 19 and 124, and in none of them in connection with a Defence contract [DSE-H-5]. “Hyperscale” occurs 0 times [DSE-H-5]. No question on the deed is recorded as put to any witness at that hearing or at the Committee’s Estimates hearing of 11 February 2026 [DSE-H-5, DSE-H-6].

What the press says, as claims. Defence Connect wrote on 27 February 2026 that “The Australian government’s new air-gapped hyperscale Defence Secret Environment, delivered with Google Cloud, has marked a major milestone” [DSE-2]. iTnews wrote on 21 December 2025 that the two projects “come under a broader program called the Defence Secret Environment or DSE” [DSE-4]. InnovationAus wrote on 5 January 2026 of an “air-gapped hyperscale cloud capability” at “the Secret security classification” [DSE-5]. Defence Connect attributes the statement that “Australia must retain legal and technical control over who can access, move and exploit national security data in the cloud” to the defence general manager of GME, an industry firm, not to Defence [DSE-2].

3 What Google publishes about the product

These are Google’s descriptions of its product, not the deed’s terms; no artefact held says the capability Defence acquired is this product [DSE-1].

Who operates it. Google’s product page states: “Google Distributed Cloud’s air-gapped solution can be operated by Google, a trusted partner, or a combination of the two with the ability to customize elements like operator citizenship and clearances.” [DSE-6]. Google’s FAQ states: “Distributed Cloud can be fully managed by Google or managed by a trusted partner.” [DSE-17], and “Customers generally choose an operating partner based on regulatory or sovereignty requirements.” [DSE-17].

Connectivity. “The solution does not require connectivity to Google Cloud or the public internet to manage the infrastructure, services, APIs, or tooling, and is built to remain disconnected in perpetuity.” [DSE-6].

The Infrastructure Operator. Google’s security overview describes it in one sentence pair: “Infrastructure operator group : manages the day-to-day operations of the system infrastructure, and has no access to customer data. This persona is the highest level administrator of the system and could be Google, a contracted third party or the customer, depending on the nature of sovereignty restrictions.” [DSE-13].

The Platform Administrator. “Platform administrator group : a customer persona that manages resources and permissions for projects. This is the highest level of administrative privilege granted to the customer and is the only administrative level that can grant access to customer data.” [DSE-13].

The out-of-band network. “The out-of-bound management (OOB) network is solely used for administrative functions such as configuration changes of the network devices, storage appliances, and other hardware components.” [DSE-13]. “Only the IO has access to the OOB network and they only have this access in exceptional cases.” [DSE-13].

Keys. “GDC provides a Key Management Service (KMS) backed by Hardware Security Modules (HSMs).” [DSE-13]. “All data at rest is encrypted by default using HSM backed keys. Customers can also choose to manage their own cryptographic keys.” [DSE-13]. Block storage is encrypted at three layers [DSE-13]. Two are managed by the customer: “Software Layer : Linux Unified Key Setup (LUKS) encryption performed within tenant-dedicated compute hardware with per-volume, HSM-backed keys, managed by the customer.” and “Appliance Layer : Volume Aggregate-level Encryption (NVE/NAE) encryption performed within Storage Appliance with per-tenant, HSM-backed keys, managed by the customer.” [DSE-13]. One is managed by the Infrastructure Operator: “Disk Layer : Self-Encrypting Drives (SEDs) with per-drive, HSM-backed keys, managed by the IO.” [DSE-13]. The same page states that the Platform Administrator, a customer persona, is “the only administrative level that can grant access to customer data” [DSE-13]. Google’s services summary states: “GDC air-gapped Racks comes with off-the-shelf hardware security modules (HSM) to manage encryption keys and secrets.” [DSE-10].

Shared responsibility. “In all configurations of GDC, Google and the operator are responsible for securing the layers of the infrastructure.” [DSE-13]. “The customer is responsible for securing the project setup and application layer, including the application containers, base images, and dependencies.” [DSE-13].

4 The finding

Each element below is stated with its own artefact. Each is what the artefact shows. No sentence here says what they compose into, and none says who operates the capability.

One. Defence names its counterparty to the deed as Google Australia Pty Ltd, in its release of 19 December 2025 and in its imagery of the signing. DSE-1, DSE-16.

Two. ASIC’s register names the counterparty’s Ultimate Holding Company as “ALPHABET INC.”, which

reports itself incorporated in Delaware. H-600-1, S1.

Three. The release names no operator and states no value, location or security classification, and says all specific details remain “strictly confidential”. DSE-1.

Four. The OCDS data holds no Defence contract notice whose title or description carries the terms listed in Section 2. A search of AusTender standing offer notices by Google Australia Pty Ltd’s ABN and by the supplier name ‘Google’, for 1 December 2025 to 3 October 2026, returned no results. This assessment makes no finding on whether any notice was required to be published. DSE-OCDS, DSE-14, DSE-S0N-1, DSE-S0N-2.

Five. The Hosting Certification Framework’s register names one Google offering, “Google Cloud Platform - Australian Regions”, and no air-gapped Google offering. This assessment does not establish whether the register covers classified deployments. DSE-9.

Six. Google publishes that “Google Distributed Cloud’s air-gapped solution can be operated by Google, a trusted partner, or a combination of the two with the ability to customize elements like operator citizenship and clearances”, and that its Infrastructure Operator “could be Google, a contracted third party or the customer, depending on the nature of sovereignty restrictions”. DSE-6, DSE-13.

Seven. Google publishes that the Infrastructure Operator “has no access to customer data”, has sole access to the out-of-band management network “in exceptional cases”, and manages the disk-layer encryption keys; and that the customer manages the software-layer and appliance-layer keys, and that the customer’s Platform Administrator is “the only administrative level that can grant access to customer data”. DSE-13.

Eight. 18 U.S.C. § 2713 reads: “A provider of electronic communication service or remote computing service shall comply with the obligations of this chapter to preserve, backup, or disclose the contents of a wire or electronic communication and any record or other information pertaining to a customer or subscriber within such provider’s possession, custody, or control, regardless of whether such communication, record, or other information is located within or outside of the United States.” S7.

Nine. The question the record leaves open, stated and not answered. Whether 18 U.S.C. § 2713 reaches data held in the capability is a legal question this assessment does not answer. On Google’s published description of its product, the facts bearing on it include who the Infrastructure Operator under the deed is (a Google entity, a partner or Defence), what the deed provides for keys and access, and who supplies the software carried into the capability. DSE-13, S7. None of these is published. DSE-1. What would establish those facts is the deed and its operating model: the operator’s identity, the key arrangements, the software supply, and the access terms.

Limitations

Pages are read as served on 3 October 2026. Rows whose bytes differ between two fetches are marked in the retrieval logs, with both bodies kept.

Estimates. The transcripts read are the Proof Committee Hansard of 3 June 2026, supplied by the director

from aph.gov.au and pinned as supplied [DSE-H-5], and the Official Committee Hansard of 11 February 2026, supplied by the director and pinned as supplied [DSE-H-6]. The March 2026 Estimates transcripts, if any, and the answers to questions on notice were not read.

AusTender. Contract notices are read from the OCDS data, published from 1 January 2023 [DSE-OCDS]. Standing offer notices were searched only by Google Australia Pty Ltd's ABN and by the supplier name "Google", for 1 December 2025 to 3 October 2026 [DSE-S0N-1, DSE-S0N-2]; standing offer notices published before 1 December 2025, or held under another supplier name, are outside that search.

Ministerial material. Media releases only; the ministers' transcripts and speeches, and defence.gov.au's own release listing beyond DSE-1, were not searched.

Google. A Google announcement of the deed is not established, and neither is the product Defence acquired.

What this assessment is not

Not a finding on who operates the capability. Not a finding on the legal effect of Google's design, or on whether any entity is within any definition of any law or could be compelled under any law. Not a finding that the capability is or is not sovereign, Secret, or a "Defence Secret Environment". Not a reading of the deed, which is not published. Not an observation about the conduct of the Department of Defence or of Google Australia Pty Ltd. Not a finding that any notice was required to be published. Not a finding that Google or any Google entity can access data in the capability. The statutory text is set out for reference and is not applied to any entity. Not advice to any agency or provider.

Related published assessments

- **AOS-TSC-2026-001**, *Sovereign, Undefined*. The ASD and AWS Top Secret Cloud, where the record does not name the entity.
- **AOS-CMP-2026-001**, *The Compellability Gap in Commonwealth Cloud Assurance*. The Alphabet annual report and the United States statute this assessment inherits.
- **AOS-HCF-2026-001**, *Jurisdiction of Control in the Hosting Certification Framework, Strategic Tier*. The ASIC extract this assessment inherits, and the register's Google entry.

References

Retrieved by this practice under convention 50 on 3 October 2026 unless stated. Hashes are the first twelve characters of each artefact's SHA-256.

- DSE-1 — Department of Defence, media release, 19 December 2025, defence.gov.au. 1689259bdfdfb.
- DSE-2 — Defence Connect, 27 February 2026. Press, a claim. c460b39d115e.
- DSE-4 — iTnews, 21 December 2025. Press, a claim. 188722ab17a1.
- DSE-5 — InnovationAus, 5 January 2026. Press, a claim. 1765ba4dc12a.
- DSE-6 — Google, Google Distributed Cloud air-gapped product page. b7d2440b095f.

- DSE-9 — Hosting Certification Framework, certified service providers. b8c018ae4f80.
- DSE-10 — Google, GDC air-gapped Services Summary. bad4a2ec6d53.
- DSE-13 — Google, GDC air-gapped security overview. 51e62e6e4ae7.
- DSE-14 — AusTender contract notice export, supplier ABN 33102417032. 3a0ff414a150.
- DSE-16 — Defence Imagery, series S20253872. d68109494072.
- DSE-17 — Google, GDC air-gapped FAQ. b39c4f35ec7e.
- DSE-S0N-1, DSE-S0N-2 — AusTender standing offer notice searches, supplier ABN 33102417032 and supplier name “Google”, 1 December 2025 to 3 October 2026, with their downloads DSE-S0N-1d, DSE-S0N-2d. ae629dece00c, f824d8219b80, 738296a45a86, 94985c231122.
- DSE-0CDS — AusTender OCDS API, contract notices published 1 January 2023 to 3 October 2026, 3,206 pages, each pinned in austender/PAGES-SHA256.txt.
- DSE-M-001 to DSE-M-044 — minister.defence.gov.au media releases, 1 December 2025 to 31 March 2026, step3/RETRIEVAL-LOG-2026-10-03-releases.tsv.
- DSE-H-5 — Proof Committee Hansard, Senate Foreign Affairs, Defence and Trade Legislation Committee, Estimates, 3 June 2026, as supplied by the director. b99f259fd4ab.
- DSE-H-6 — Official Committee Hansard, Senate Foreign Affairs, Defence and Trade Legislation Committee, Estimates, 11 February 2026, as supplied by the director. 5d333bec52da.
- H-600-1 — ASIC Current Company Extract, Google Australia Pty Ltd, 21 July 2026. Inherited from hcf-strategic-2026-07. 0194e23423ae.
- S1 — Alphabet Inc., Form 10-K for the fiscal year ended 31 December 2025. Inherited from compellability-gap-2026-07. c2f6301004f3.
- S7 — 18 U.S.C. § 2713, govinfo.gov. Inherited from compellability-gap-2026-07. 3a242ef2c1ee.

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