

**OFFICIAL: SENSITIVE****The Hon Michelle Rowland MP**

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**Attorney-General  
Federal Member for Greenway**

Reference: MS25-000916

The Hon Paul Brereton AM RFD SC  
Commissioner  
National Anti-Corruption Commission  
GPO Box 605  
CANBERRA ACT 2601

s 47E(d), s 47F @nacc.gov.au

Dear Commissioner Brereton

Thank you for your letter on 16 September 2025 notifying me of your declaration of material personal interests for the purposes of section 29 of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and section 247 of the *National Anti-Corruption Commission Act 2022*.

I note that, prior to your appointment as Commissioner, you advised the then Attorney-General, the Hon Mark Dreyfus KC MP, that you would retain your unpaid position as Major General, which would enable you to provide ongoing assistance and advice to the Office of the IGADF.

I also note that prior to your appointment in 2023 you disclosed to the Attorney-General's department your intention to continue to provide, on a strictly informal basis, advice and responses to requests for information as the IGADF undertakes ongoing work related to the implementation of the Afghanistan Report, and made an undertaking to delegate to a Deputy Commissioner any matters arising before the commission related to the IGADF.

Your recent declaration of interests, and your earlier declaration of interests provided to the former Attorney-General on 11 August 2023, do not provide details of the nature and extent of the activities you are undertaking at the request of IGADF. No declaration was made of the extension in June 2024 of your compulsory Defence retirement age to August 2026. Nor did the Commission's responses to questions at Senate Estimates in February 2025 adequately address the nature of your ongoing engagement and provision of advice to the IGADF.

Public confidence in the Commission is reliant on the Commission being seen to effectively manage perceived or actual conflicts of interests and providing transparency, as far as appropriate, about these matters. I acknowledge the Commission's ongoing commitment to managing conflict of interests and am aware that the Commission's conflict of interest management processes were amended following the Inspector of the National Anti-Corruption Commission's report on the Commission's decision not to investigate the

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The Hon Michelle Rowland MP  
PO Box 6022, Parliament House, Canberra

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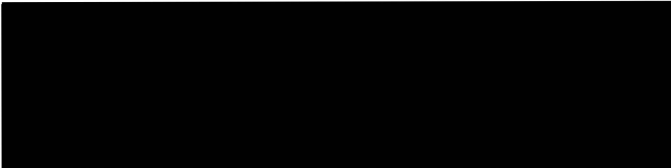
Robodebt referrals. I am also aware that you do not participate in decisions of the Commission in relation to the IGADF. While the management of potential conflicts of interest is a matter for yourself and the Chief Executive Officer of the Commission under the PGPA Act, I would appreciate the following:

- consideration of whether an updated declaration of interests should be provided
- confirmation of steps taken by yourself and the Commission to manage any actual or perceived conflict of interest arising from your involvement with the IGADF, including how the CEO is kept informed, and
- steps taken to ensure this work does not affect your ability to fulfil your duties as Commissioner.

In your declaration, you note that if a matter comes before the Commission affecting the interests of an individual or entity with which you have an affiliation, you will consider if an actual or perceived conflict arises and, if necessary, take steps to mitigate it. I suggest it would be preferable for you to declare all relevant affiliations and interactions to the CEO. If an actual conflict of interest arises it should always be mitigated through non-participation in decision-making.

I would appreciate your timely advice on the above matters given the public interest in the management of these issues.

Yours sincerely



Michelle Rowland MP

10 / 10 / 2025