Appendix 3

Correspondence

Senator the Hon Marise Payne
Minister for Defence

MS18-002063

Mr Ian Goodenough MP
Chair
Parliamentary Joint Committee on Human Rights
Parliament House
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Dear Mr Goodenough

Thank you for your email of 20 June 2018 seeking a response to the Parliamentary Joint Committee on Human Rights assessment of the Defence (Inquiry) Regulations 2018.

Coercive evidence-gathering powers

The Defence (Inquiry) Regulations 2018 contain coercive evidence-gathering powers, with associated offences in the event of non-compliance, in order to ensure that all necessary information can be obtained in order to facilitate the making of decisions relating to the Australian Defence Force. Noting that the purpose of the Defence (Inquiry) Regulations 2018 is not to punish individuals, there are corresponding provisions which protect the use of information gathered through such coercive powers.

The Committee seeks advice whether the coercive evidence-gathering powers and abrogation of the privilege against self-incrimination are a proportionate means of achieving the stated objective. This includes whether the 'derivative use' immunity is reasonably available as a less restrictive rights alternative.

Subsection 124(2C) of the *Defence Act 1903* contains the power to make regulations conferring a 'use' immunity. It does not contain the power to make regulations conferring a 'derivative use' immunity. Therefore, a 'derivative use' immunity is not currently reasonably available as a less restrictive alternative to ensure that information or evidence cannot be used indirectly against the person.

In any case, the 'use' immunity is considered to be a proportionate means of achieving the objectives of Defence inquiries. Given the absence of a 'derivative use' immunity it is possible that information obtained through coercive powers could be used indirectly, such as to gather other evidence against that individual in other investigations or proceedings, however there are other appropriate and proportionate safeguards contained in the Defence (Inquiry) Regulations 2018. These include the requirement that hearings of Commissions of Inquiry in Part 2 and Inquiry Officer Inquiries in Part 3 be held in private, and the prohibitions against the use and disclosure of certain information and documents (including the application of the exemption under section 38 of the *Freedom of Information Act 1982*). Thus, if a person gives evidence that may tend to incriminate the person, subsequent use or publication of that evidence can be prohibited. This reduces the risk that the evidence could be used for other purposes, such as by Commonwealth prosecutors and law enforcement personnel.

In relation to the regulatory context of inquiries, an inquiry official is only empowered to gather information that is within the scope of their inquiry. The Instrument of Appointment which appoints an inquiry official will contain 'terms of reference' setting out the scope of the inquiry. An inquiry official has no power to gather incriminating evidence or information which is not relevant to, or falls outside, the scope of the inquiry, and may have their appointment terminated if they attempt to do so. Further, potentially adversely affected persons in a Commission of Inquiry have an entitlement to legal representation at Commonwealth expense. In an Inquiry Officer Inquiry, Australian Defence Force (ADF) members (who are the only individuals compellable under Part 3) have a general right of access to legal assistance at Commonwealth expense, and may request the presence of a legal officer at interviews. This enables witnesses to seek legal advice on their participation in inquiries.

While the concerns of the Committee are noted, it is considered that the benefits in abrogating the privilege against self-incrimination, coupled with the use immunity in subsection 124(2C) of the *Defence Act 1903* and other safeguards, outweigh any potential harm to personal liberty in this instance. The purpose of inquiries under the Defence (Inquiry) Regulations 2018 is to determine the facts and circumstances surrounding an incident so that informed decisions can be made about what actions are required to address the immediate danger or issue, or to avoid repetition of the incident in the future. These inquiries are intended to protect the organisation and not to punish individuals.

In terms of the right to privacy, an individual would only be required to disclose personal information as part of a coercive evidence-gathering process if that information is relevant to the inquiry and within the scope of the inquiry's terms of reference. In some inquiries, such as those involving sensitive personnel matters, it is foreseeable that personal information will be relevant and therefore may be obtained. In other inquiries, such as one following a safety incident, personal information beyond the names, ranks and locations of individuals is unlikely to be relevant and, therefore, could not be obtained.

If personal information is obtained through coercive powers, it will be subject to a number of safeguards against the subsequent use and disclosure of that information, as discussed below. While there may be a requirement to transmit information quickly across the Defence organisation in order for necessary steps to be taken immediately (such as to mitigate risks to individuals where a report contains safety critical information which need to be actioned quickly to prevent further safety incidents from occurring), in such instances steps will be taken to protect the privacy of individuals referred to in the records where practicable. Where time or other factors do not permit this action, the risk to safety will outweigh any risks associated with breach of a person's privacy.

Authorisations to use, disclose and copy information and documents

The Committee has expressed concern about the compatibility of the use and disclosure provisions with the right to privacy.

Sections 26 and 58 do not operate to allow any employee of the Commonwealth or member of the Defence Force to make any information in inquiry records publicly available. Disclosure of inquiry records to the public would only be permitted if the disclosure were within the course of the person's duties or authorised by the Minister in accordance with sections 27 or 59.

Whether disclosure is within the scope of a person's duties will depend on the nature of the person's position and the role of the individual seeking to disclose the information. Guidance contained in Chief of the Defence Force Directive 08/2014 (the relevant extract of which has been enclosed for the Committee's reference) states that disclosure to the public or wide disclosure within Defence is unlikely to be part of, or incidental to, a person's duties. The Directive provides general examples of different roles and functions within the ADF. A commanding officer in the ADF has functions associated with the welfare of his or her subordinates, so their performance of duties includes matters incidental to maintaining the welfare of his or her subordinates. A legal officer in the ADF has functions associated with giving legal advice to command, so their performance of duties includes matters incidental to giving the legal advice. The Directive also provides common examples of disclosures internally within and externally to Defence that may fall within the performance of a person's duties. These include internal disclosures of inquiry records to other Defence staff for the purpose of implementing inquiry outcomes, dealing with complaints, designing training, policy, procedures, instructions and orders; and affording procedural fairness.

The Directive states that external disclosures would usually be within the duties of a dedicated liaison officer of the relevant external Department or agency. Given that the purpose of inquiries under the Defence (Inquiry) Regulations 2018 is to facilitate the making of decisions relating to the Defence Force, few inquiry records would need to be made available outside the Defence organisation. The most likely scenario is where inquiry records concerning a safety incident are provided to the Department of Veterans' Affairs to enable that Department to consider an ADF member's compensation claim. In the event that an Australian Public Service (APS) employee outside the Department is provided with inquiry records under section 26 or 58, then that APS employee will be also bound by the legislative restrictions. That is, they will equally not be permitted to use, disclose or copy inquiry records unless it is within the course of their employment.

In the above examples, a commanding officer maintaining the welfare of his or her subordinates, a legal officer giving legal advice to command, the implementation of inquiry outcomes, development of certain material, affording procedural fairness, or providing inquiry records to the Department of Veterans' Affairs to enable it to consider a compensation claim, are legitimate objectives for the purposes of international human rights law. Using or disclosing inquiry records or reports which may contain personal information is rationally connected to that objective.

When considered in the context of the various safeguards contained in both the Defence (Inquiry) Regulation 2018 and the supporting policy, the use and disclosure provisions are proportionate to achieve that objective. Those safeguards include the offences and provisions contained in section 37 or 66 of the Defence (Inquiry) Regulations 2018, the *Privacy Act 1988* and section 70 of the *Crimes Act 1914* for unauthorised disclosures. In addition, the current content in Chief of the Defence Force Directive 08/2014 (discussed above) constitutes a general order to ADF members for the purposes of the *Defence Force Discipline Act 1982*, meaning that unauthorised public disclosure of inquiry records by ADF members, who for the most part will be handling such records, may result in internal administrative or disciplinary action. I am advised by Defence that the intention is that the Chief of the Defence Force Directive 08/2014 will be updated.

Sections 27 and 59 provide a broader mechanism for inquiry records to be used, disclosed or copied in any circumstances. The purpose of sections 27 and 59 is to allow use, disclosure or copying of inquiry records in circumstances where it there is a legitimate objective for the purposes of human rights law, but where such would not ordinarily be within the course of an APS employee or ADF member's employment. For example, it may be legitimate for the family of a deceased ADF member to be provided with information surrounding the ADF member's death. Providing them with a copy of the report would be rationally connected to that objective, but doing so would not ordinarily be within the scope of a person's duties and therefore not within the scope of sections 27 and 58. In this instance, the Minister could authorise the Chief of the Defence Force under section 27 or 59 to disclose a copy of an inquiry report to the family.

Sections 27 and 59 are proportionate to their objective, as they provide a mechanism for using or disclosing inquiry records containing personal information in a way that is the least restrictive of the right to privacy. Consistent with Defence and privacy policies, the Minister may impose conditions, such as that the personal information of individuals be redacted prior to the report being disclosed. The requirement that the Minister identifies the specific purpose for which the use or disclosure is being authorised limits the use and disclosure of inquiry records to the specific purpose which the Minister has turned his or her mind to, and not some other broader purpose.

Sections 28 and 60 provide a broad power for the Minister to use, disclose and copy inquiry records for purposes relating to the Defence Force. As the Minister for Defence has general control and administration of the Defence Force under the *Defence Act 1903*, and the purpose of inquiries under the Defence (Inquiry) Regulations 2018 is to facilitate the making of decisions relating to the Defence Force, it is essential that the Minister retains this broad power. These provisions, therefore, serve legitimate objectives for the purposes of international human rights law, and using or disclosing inquiry records or reports which may contain personal information is rationally connected to that objective. It is also proportionate to achieve the objective, noting that the use or disclosure may only occur where it is necessary to facilitate decision-making and that this broad power is only held by the Minister who, as with the exercise of other statutory powers, will remain accountable to Parliament.

Following its publication, the Explanatory Statement to the Defence (Inquiry) Regulations 2018 was updated to include additional information on disclosure under sections 26, 27 and 58.

Reversal of the evidential burden of proof

The Defence (Inquiry) Regulations 2018 contain a number of offences associated with failing to comply with a notice or order to appear or provide documents or answer questions, and disclosing inquiry records without permission or authorisation. The offences also provide express matters that could be considered as defences for complying with notices or orders. This means that a defendant who wishes to rely on the relevant matter bears an evidential burden of adducing or pointing to evidence that suggests a reasonable possibility that the matter exists. This amounts to a reversal of the burden of proof. The Committee seeks advice on the compatibility of the reverse burden with the right to the presumption of innocence.

To rely on the relevant matter in relation to the offence provisions, the defendant would be required to adduce or point to evidence that they held the relevant belief, that the circumstances made compliance unduly onerous for them, or that they had the relevant permission or authorisation. Once they have done this, the prosecution would need to disprove the existence of the belief, circumstances, permission or authorisation in order to prove the offence.

The purpose of the offences is to ensure that the inquiry official is able to obtain the best information or evidence available on which to base his or her findings, which will then be used to facilitate decision-making. The best information or evidence ensures that the best decisions are made. This is a legitimate objective for the purposes of international human rights law. The offences, and the reverse evidential burden as discussed above, are effective to achieve that objective. The penalties for these offences are relatively low.

The reverse evidential burden is reasonable and proportionate to achieve that legitimate objective. The existence of the relevant circumstances referred to in the offences can be readily and cheaply established by the defendant, while it would be significantly more difficult and costly for the prosecution to positively disprove the existence of these matters beyond reasonable doubt as a matter of course. For example, a prosecution for disclosure of inquiry records without authorisation would require a reasonable belief that there was no authorisation or permission, which would be difficult for a prosecutor to establish. Additionally, the belief of the person that compliance is likely to cause damage to Defence, or that the circumstances made compliance unduly onerous, requires consideration of factors which are peculiarly within the knowledge of the defendant. For example, in relation to whether compliance is unduly burdensome, the volume of information to be provided and the personal circumstances of the person vis a vis the requirements of the order or notice would only be known by the person.

Following its publication, the Explanatory Statement to the Defence (Inquiry) Regulations 2018 was reissued to include additional information on the justification for the reverse burden of proof in sections 29, 30, 32, 36, 37, 61, 62 and 66.

I trust that this response addresses the Committee's concerns. The Committee's comments on the content of statements of compatibility are noted, and we will endeavour to address the guidance you have referred to in future explanatory material. Should the Committee wish to publish the extract of the Chief of the Defence Force Directive 08/2014 provided with this response, I request that my Department is advised accordingly to provide comment, as required. I have also enclosed a copy of the current version of the Explanatory Statement to the Defence (Inquiry) Regulations 2018 for the Committee's reference, which was reissued with additional information in May 2018 at the request of the Senate Standing Committee on Regulations and Ordinance.

Yours sincerely

MARISE PAYNE
Encl

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The Hon Alan Tudge MP

Minister for Citizenship and Multicultural Affairs

Ref No: MS18-002317

Mr Ian Goodenough MP
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Dear Mr Goodenough Ian

Thank you for your letter of 20 June 2018 in which further information was requested on the *Migration Legislation Amendment (Temporary Skill Shortage Visa and Complementary Reforms) Regulations 2018.*

I have attached the response to the *Parliamentary Joint Committee on Human Rights' Report 5 of 2018* as requested in your letter.

Thank you for raising this matter.

Yours sincerely

Alan Tudge

09/07/2018

Department of Home Affairs response to Parliamentary Joint Committee on Human Rights regarding the Migration Legislation Amendment (Temporary Skill Shortage Visa and Complementary Reforms) Regulations 2018

Committee comment:

1.50 The preceding analysis indicates that the measure engages the right to freedom of association.

1.51 The committee seeks the advice of the minister as to the compatibility of the measure with this right, including:

- **whether there is reasoning or evidence that establishes that the stated objective addresses a pressing or substantial concern or whether the proposed changes are otherwise aimed at achieving a legitimate objective;**
- **whether the measure is rationally connected (that is, effective to achieve) that objective; and**
- **whether the measure is a proportionate means of achieving its objective (including whether the definition of 'associated with' is sufficiently circumscribed).**

Department of Home Affairs response:

With the introduction of the Temporary Skill Shortage (TSS) visa in March 2018, the Department expanded the definition of 'associated with' at Regulation 1.13B due to integrity concerns in the previous subclass 457 visa program. The previous definitions were inadequate to deal with some abuses within the subclass 457 visa program. This was particularly in situations where previously sanctioned/cancelled sponsors closed the operations of one company, and then created a new legal entity to continue using the 457/TSS program to sponsor overseas workers.

The expanded definition of 'associated with' under Regulation 1.13B allows the Department to address, among other issues, phoenixing activities by companies and networks of non-compliant entities (for example, brothers running two separate companies engaged in visa fraud). In applying this definition, the association must be clear – that is, the 'associated with' person must be engaged in behaviour that falls within the definition of 'adverse information' at Regulation 1.13A. Given that most sponsors are companies, not individuals, Regulation 1.13B allows the Department to consider relevant linkages between companies that may have the same directors, majority shareholders, office holders, managers or people closely related to these positions of authority. There are limits to what is relevant for the purposes of taking into account 'adverse information'. Therefore, the expanded definition of 'associated with' is applied to ensure relevant linkages between companies who have adverse information against them can be identified to prevent further activities that contravene Australian law, including non-compliance with the *Migration Act 1958 (Cth)* (the Migration Act).

Case Study:

In 2012, Company A was approved as a standard Business Sponsor and sponsored approximately 27 workers holding 457 visas to work across seven different business locations under the control of the one sponsorship agreement. Company A was under the control of a single Director A. Allegations from 2012 to 2017 identified that Director A was engaging in payment for visa sponsorship, which is an offense under Sections 245AR and 245AS of the Migration Act. Monitoring by the Australia Border Force (ABF) in 2014 resulted in a sanction bar of two years for provision of false or misleading information (regulation 2.90).

Shortly thereafter, multiple companies were set up that took over the operations of each of the business locations formerly operated by Company A. By 2017, this resulted in 22 additional companies being created, all of which lodged applications for standard business sponsors. Most of these companies were approved as sponsors and subsequently nominated overseas workers for 457 visas.

In 2017, an assessment of the cohort of 23 companies identified that Director A is only listed as Director for two of the 23 companies. Each of the 23 companies had a single Director who the ABF identified were either Director A's elderly parents, his current and former wife or former visa holders who were granted permanent residence or citizenship via Company A. Evidence collected by the ABF found that Director A was the controlling entity for most of the 23 companies, was account signatory for business accounts or identified as the 'boss' by the employees.

In 2017, the Department and the ABF identified that 17 of the companies had provided false or misleading information to the Department in support of applications to become standard business sponsors.

The identified shortfalls of the monitoring legislation at the time identified that Director A was able to spread his risk that if one company was identified by the Department and sanctioned, that the remaining companies (and visa holders) would continue to remain as sponsors. The added benefit of this was that each sponsor was considered low risk to the Department due to the low number of visa holders nominated per company. When a company was identified by the Department or ABF as having adverse information against it, Director A simply transferred its operations to a new company that then applied to become a sponsor, thereby ensuring that the new company had a clean record with the Department.

In 2017, the Department sanctioned 12 of the companies for provision of false or misleading information, and refused visa applications lodged by the remaining 11 companies.

This case study shows that being associated with certain individuals or companies engaged in conduct that would be considered 'adverse information', can affect the suitability of a sponsor or nominator who is associated with that individual or company. This is particularly the case when the associated person has engaged in conduct that is non-compliant with the Migration Act. Therefore, the definition is applied to achieve the legitimate objective of preventing non-compliant conduct.

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MC18-004623

Mr Ian Goodenough MP
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10 JUL 2018

Dear Mr Goodenough Ian,

Thank you for your email of 20 June 2018 regarding the Social Security (Assurances of Support) Determination 2018 and Social Security (Assurances of Support) Amendment Determination 2018 regarding the compatibility of these two Determinations to the right to the protection of the family.

You asked whether there is reasoning or evidence that establishes that the stated objective addresses a pressing or substantial concern or whether the proposed changes are otherwise aimed at achieving a legitimate objective for the purposes of international human rights law.

Regarding this issue, it is worth noting that the purpose of the Social Security (Assurances of Support) Determination 2018 and Social Security (Assurances of Support) Amendment Determination 2018 is to continue existing requirements under the Assurance of Support (AoS) Scheme as the previous determination sunset on 1 April 2018.

The Social Security (Assurances of Support) Amendment Determination 2018 revises certain requirements of the Social Security (Assurances of Support) Determination 2018. These changes:

- reduce the income threshold for individual assurers to the level that were in place immediately prior to 1 April 2018
- remove the requirement that an assurer needs to be in Australia when lodging their application
- remove the requirement that an applicant must not have a debt owing to the Australian Government (for example, a debt owed to the Australian Taxation Office).

These amendments reduce the AoS requirements for assurers and therefore enhance the prospect of families joining each other and the right to protection of families for the purposes of international human rights law.

The AoS scheme is a proportionate means of achieving its objective as it allows migrants who have a higher likelihood of requiring income support to come to Australia. The requirements under the AoS scheme ensures an assurer has the capacity to provide the level of financial support required by a visa entrant. If a potential assurer does not meet the AoS income requirements, the option of entering into a joint AoS arrangement is available.

The AoS scheme also allows the visa entrant access to social security payments, subject to meeting waiting periods and other eligibility criteria, if the assurer is not able to provide adequate support to the visa entrants during the assurance period. The assurer is responsible for repayment of any recoverable social security payments received by the visa entrants during the assurance period.

Should you have any questions regarding this response please contact Ms Anita Davis, Branch Manager, International Policy and Payment Support Branch on 02 6146 4246.

Thank you again for raising this matter with me.

Yours sincerely

DAN TEHAN

THE HON JOSH FRYDENBERG MP
MINISTER FOR THE ENVIRONMENT AND ENERGY

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MC18-009812

23 JUL 2018

Dear Mr Goodenough Ian

Thank you for your email on behalf of the Parliamentary Joint Committee on Human Rights (the Committee) requesting advice on the human rights compatibility of the five Australian marine park management plans before Parliament, in its Scrutiny Report 5 of 2018.

The Committee sought my clarification on the regulation of commercial media under marine park management plans. I understand the concerns raised relate to the right to freedom of expression through the communication of information and ideas through the media. In question is the compatibility of this right with measures in the plans whereby: news of the day reporting may be undertaken on terms determined by the Director of National Parks (the Director), and subject to the Director being notified; and other commercial media activities other than news of the day reporting can be carried out in accordance with a permit issued by the Director.

In particular, the Committee seeks clarification on:

- the extent of the limitation the measure imposes on the right to freedom of expression (such as, information about the terms determined by the Director in relation to news-of-the day reporting, and the process for the issue of a permit or permission for other reporting);
- whether the measure is aimed at achieving a legitimate objective for the purposes of human rights law;
- how the measure is effective to achieve (that is, rationally connected to) that objective; and
- whether the limitation is a reasonable and proportionate measure to achieve the stated objective (including the existence of any safeguards).

The authorisation of commercial media by the Director of National Parks is done in accordance with the management plan objective to protect the natural, cultural and heritage values of marine parks.

Commercial news agencies may carry out activities within the marine parks for the purpose of reporting news of the day, without obtaining individual authorisation from the Director but must comply with terms determined by the Director, while doing so to protect park values.

While commercial media, other than reporting of news of the day, requires authorisation from the Director, the assessment of permit/licence applications and the conditions placed on those authorisations relates only to the impact on park values and other park users. It does not consider the manner in which images or sounds will be used or place conditions on their use.

The measures outlined, do not control how images or sounds are used and thereby place no restriction on the right to freedom of expression. They are considered proportionate to achieving the objective of the management plans to protect natural, cultural and heritage values of marine parks. The following provides a more detailed explanation of the legislative context and process by which news of the day reporting can be carried out under the management plans, and by which the Director can authorise other commercial media activities in marine parks.

Legislative context

Sections 354 and 354A of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) prohibit certain activities in Commonwealth reserves (including Australian marine parks) unless they are done in accordance with a management plan. The purpose of a management plan is to set out how activities prohibited by the EPBC Act may be undertaken in Commonwealth reserves, while protecting the reserve's environmental, cultural and heritage values and managing the impact of activities on those values and other park visitors.

The prohibitions in the EPBC Act include taking actions for a commercial purpose. Photography, filming or sound recording for commercial purposes, including for example in-water filming and recording by documentary makers or feature film makers and reporting by commercial news agencies, is therefore prohibited by the EPBC Act in Australian marine parks unless done in accordance with a management plan in effect for that park. The management plans do not create a restriction on media activities - they relieve one.

Authorising and regulating commercial media activities in Australian marine park management plans

Australian marine park management plans pursue the objective of the EPBC Act to promote the conservation of biodiversity and to provide for the protection and conservation of heritage. Part 4 of the Australian marine park management plans set out how commercial media activities may be carried out in the marine parks. The term 'commercial media' is used in the management plans to describe all image capture or sound recording for commercial purposes.

Commercial media activities for the purposes of reporting news of the day is allowed under the management plan, but must comply with terms determined by the Director. Guidance on the 'terms determined by the Director' will be prepared for these activities and made available on the Parks Australia website. Activities for news of the day reporting are likely to be time sensitive to capture breaking news or an event of the moment and are typically small scale and less likely to impact park values. The number of crew, amount of equipment and duration of filming are considered in assessing the risk to values. These activities don't require individual authorisation as opposed to other commercial media activities such as a film or documentary which are better managed by permit or licence, given the greater risk they may pose to park values (such as larger crew and equipment needs and more time for filming).

For commercial media activities that include image capture and sound recording, other than reporting news of the day, the management plan requires the Director to issue an authorisation by permit or licence. Applicants apply online through a portal on the Parks Australia website. Following receipt of the application, decisions about activities will be consistent with the plan and zone objectives and take into account the impacts and risks of the activity on the park values. The assessment is not based on how the images/sounds will be used or what the applicant intends to convey through those images/sounds. The impacts and risks will be assessed in accordance with policies established under the assessments and authorisations program outlined in the management plans. The difference in approach reflects that permitted or licensed projects typically pose greater impacts and risks to park values.

The Director can only determine terms for the carrying out of activities for the purpose of reporting news of the day, and impose conditions on the authorisation of other commercial media activities, which are within the Director's powers and functions under the EPBC Act. Relevantly, the Director's functions under s.514D of the EPBC Act are to protect, conserve and manage biodiversity and heritage in Commonwealth reserves. Accordingly, the terms determined by the Director or the conditions of authorisations specifically aim to avoid or mitigate impacts and risks of commercial media activities within marine parks, to as low as reasonably practicable. For example, a condition that has been placed on a licenced or permitted commercial media activity in a marine park related to the use of a chemical in the water to alter marine bird behaviour.

As such, the assessment, approval and conditions on commercial media under marine park management plans and the terms for reporting news of the day do not extend to restricting the right to freedom of expression in any medium, including written and oral communications, the media, public protest, broadcasting, artistic works or advertising, and is consistent with article 19 of the International Covenant on Civil and Political Rights.

Thank you for raising this matter with me.

Yours sincerely

JOSH FRYDENBERG

CC: Assistant Minister for the Environment, the Hon Melissa Price MP