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National Anti-Corruption Commission

Commissioner

Ref: 24#36457DOC

14 October 2024

The Hon Mark Dreyfus KC MP
Attorney-General

BY EMAIL: s 22 @ag.gov.au

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of s 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and s 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

No material financial interests to declare

I do not have any financial interests that are likely to relate to the affairs of the Commission. The trustee of my self-managed superannuation fund, [s 47F\(1\)](#), has shareholdings in a range of public listed entities. None of those shareholdings amounts to a "substantial shareholding" within the meaning of the *Corporations Act*. The shareholdings are not substantial interests in those entities. It is conceivable that one or more of those entities could be or become a contractor to the Commonwealth. Should a matter potentially affecting the interests of any of those entities come before the Commission, I would consider whether [s 47F\(1\)](#) shareholding was such as to create a material conflict of interest, and if so what mitigations should be put in place to deal appropriately with it.

Relationships with Defence officials

As I have previously declared, as a result of my service in the ADF Reserve, many members of the Australian Defence Force and the Department of Defence are known to me. There are some with whom I have, or have had, a close connection. I also have an affiliation with some units or agencies (in particular, the Royal New South Wales Regiment and the University of New South Wales Regiment, of which I remain (honorary) Colonel Commandant; the Sydney University Regiment (of which I remain a member of the Regimental Council); and the Inspector-General of the ADF). Should a matter potentially affecting the interests of an

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individual with whom I have had or have a close association, or a unit or agency with which I have an affiliation, come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Relationship with s 47F(1)

In particular, as I have previously declared, the s 47F(1) is one of those with whom I have had a s 47F(1) s 47F(1), such as could give rise to a perceived conflict of interest. If in the future s 47F(1) were to be the subject of a referral to the Commission, I would not be the decision-maker, and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Relationships with other senior Commonwealth officials

In the course of my tenure as National Anti-Corruption Commissioner, I have had contact with a number of senior Commonwealth officials, including agency heads. I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

s 47F(1)

s 47F(1)

s 47F(1). In the unlikely event that any matter involving s 47F(1) or potentially affecting s 47F(1) interests were to come before the Commission, I would not be the decision-maker and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Contacts with parliamentarians and former parliamentarians

I have had purely professional contact with a number of parliamentarians or former parliamentarians, as a result of my senior ADF Reserve roles, chiefly in the course of providing briefings on ADF Reserve issues or on the Afghanistan Inquiry, and more recently as Commissioner, in particular:

- Mr David Feeney, when he was Parliamentary Secretary for Defence;
- Mr Stuart Robert, when he was Assistant Minister for Defence (he also called on me to introduce himself when he was Shadow Assistant Minister, and as Assistant Minister he participated in the launch of Project SUAKIN with me when I was Head of Reserves);
- Senator Marise Payne, when she was Minister for Defence;
- Mr Christopher Pyne, when he was Minister for Defence;
- Mr Christian Porter, when he was Attorney-General;
- Senator Linda Reynolds, when she was Minister for Defence (I also had contact with her when she was serving in the Army Reserve as Commanding Officer, 5th Brigade Administrative Support Battalion when I was Chief of Staff 5th Brigade);
- Mr Richard Marles MP, when he was Shadow Minister for Defence, and more recently;
- Yourself, when you were Shadow Attorney-General, and more recently; and

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- Mr Matt Thistlethwaite MP, in his capacity as Minister Assisting the Minister for Defence.

I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Other matters

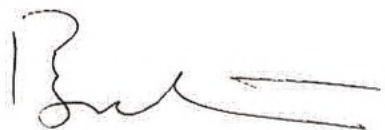
It is always possible that a matter that could potentially affect the interests of some other person known to me could come before the Commission. Should that occur, I would in each case consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Conclusion

I note that there is a continuing duty to disclose material personal interests relating to the affairs of the Commission. Should I become aware of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act 2022* (Cth).

I would be happy to discuss this letter with you or your office. I can be contacted directly on [§ 22](tel:§ 22), or mobile [§ 22](tel:§ 22) or by email at § 22@nacc.gov.au.

Yours sincerely,



The Hon PLG Brereton AM RFD SC
Commissioner

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National Anti-Corruption Commission

Commissioner

Ref: 25#15750DOC

16 September 2025

The Hon Michelle Rowland MP
Attorney-General

BY EMAIL: s.22@ag.gov.au; s.22@ag.gov.au

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of s 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and s 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

No material financial interests to declare

I do not have any financial interests that are likely to relate to the affairs of the Commission. The trustee of my self-managed superannuation fund, [s 47F\(1\)](#), has shareholdings in a range of public listed entities. None of those shareholdings amounts to a "substantial shareholding" within the meaning of the *Corporations Act*. The shareholdings are not substantial interests in those entities. It is conceivable that one or more of those entities could be or become a contractor to the Commonwealth. Should a matter potentially affecting the interests of any of those entities come before the Commission, I would consider whether [s 47F\(1\)](#) shareholding was such as to create a material conflict of interest, and if so what mitigations should be put in place to deal appropriately with it.

Relationships with Defence officials

As I have previously declared, as a result of my service in the ADF Reserve, many members of the Australian Defence Force and the Department of Defence are known to me. There are some with whom I have, or have had, a close connection. I also have an affiliation with some units or agencies (in particular, the Royal New South Wales Regiment and the University of New South Wales Regiment, of which I remain (honorary) Colonel Commandant; the Sydney University Regiment (of which I remain a member of the Regimental Council); and the

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Inspector-General of the ADF). Should a matter potentially affecting the interests of an individual with whom I have had or have a close association, or a unit or agency with which I have an affiliation, come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Relationship with s 47F(1)

In particular, as I have previously declared, the s 47F(1) is one of those with whom I have had a s 47F(1) s 47F(1), such as could give rise to a perceived conflict of interest. If s 47F(1) were to be the subject of a referral to the Commission, I would not be the decision-maker, and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Relationships with other senior Commonwealth officials

In the course of my tenure as National Anti-Corruption Commissioner, I have had contact with a number of senior Commonwealth officials, including agency heads. I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

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I have had purely professional contact with a number of Commonwealth parliamentarians or former parliamentarians, as a result of my senior ADF Reserve roles, chiefly in the course of providing briefings on ADF Reserve issues or on the Afghanistan Inquiry, and more recently as Commissioner, in particular:

- Mr David Feeney, when he was Parliamentary Secretary for Defence;
- Mr Stuart Robert, when he was Assistant Minister for Defence (he also called on me to introduce himself when he was Shadow Assistant Minister, and as Assistant Minister he participated with me in the launch of Project SUAKIN when I was Head of Reserves);
- Ms Marise Payne, when she was Minister for Defence;
- Mr Christopher Pyne, when he was Minister for Defence;
- Mr Christian Porter, when he was Attorney-General;
- Ms Linda Reynolds, when she was Minister for Defence (I also had contact with her when she was serving in the Army Reserve as Commanding Officer, 5th Brigade Administrative Support Battalion when I was Chief of Staff 5th Brigade);

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- Mr Richard Marles MP, when he was Shadow Minister for Defence, and more recently while he had been Deputy Prime Minister and Minister for Defence;
- Mr Mark Dreyfus KC MP, when he was Shadow Attorney-General, and more recently while he was Attorney-General;
- Mr Matt Thistlethwaite MP, in his capacity as Minister Assisting the Minister for Defence; and
- Yourself, in your capacity as Attorney-General.

I do not regard any of those contacts as being likely to create a potential conflict in relation to matters that might come before the Commission. However, should matters potentially affecting the interests of any of them come before the Commission, I would consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Other matters

It is always possible that a matter that could potentially affect the interests of some other person known to me could come before the Commission. Should that occur, I would in each case consider whether the circumstances were such as to create an actual or perceived conflict of interest, and if so declare it in accordance with the Commission's procedures and, if appropriate, implement strategies to mitigate it, including if appropriate not being the decision-maker and allocating the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

Conclusion

I note that there is a continuing duty to disclose material personal interests relating to the affairs of the Commission. Should I become aware of any material personal interest that relates to the affairs of the Commission, I will disclose it to you in accordance with the requirements in section 247 of the *National Anti-Corruption Commission Act 2022* (Cth).

I would be happy to discuss this letter with you or your office. I can be contacted directly on s 22, or mobile s 22, or by email at s 22 @nacc.gov.au.

Yours sincerely,



The Hon PLG Brereton AM RFD SC
Commissioner



National Anti-Corruption Commission

Commissioner

Ref: 25#31381

22 October 2025

The Hon Michelle Rowland MP
Attorney-General

BY EMAIL: attorney@ag.gov.au

Dear Attorney,

DECLARATION OF MATERIAL PERSONAL INTERESTS

The purpose of this letter is to provide you with my declaration of material personal interests that relate to the affairs of the National Anti-Corruption Commission (Commission), for the purposes of section 29 of the *Public Governance, Performance and Accountability Act 2013* (Cth) and section 247 of the *National Anti-Corruption Commission Act 2022* (Cth), pursuant to which I must disclose to you any material personal interest that I have that relate to the affairs of the Commission. In accordance with that requirement, I disclose the following matters.

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Relationships with Defence officials

As I have previously declared, as a result of my service in the ADF Reserve (in which I retain my commission as a Major General, as noted in the then Attorney-General's letter to me of 30 March 2023), many members of the Australian Defence Force and the Department of Defence are known to me. There are some with whom I have, or have had, a close connection. I also have an affiliation with some units or agencies (in particular, the Royal New South Wales Regiment and the University of New South Wales Regiment, of which I remain (honorary) Colonel Commandant; the Sydney University Regiment (of which I remain a member of the Regimental Council); and the Inspector-General of the ADF (IGADF) (to whom I continue,

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from time to time, on an informal and voluntary basis, to provide advice and respond to requests for information relating to the Afghanistan Inquiry Report, in accordance with the arrangements described in the then Attorney-General's letter to me of 30 March 2023).

To date, and in accordance with the arrangements described in your predecessor's letter of 30 March 2023, I have taken the approach that should a matter potentially affecting any Defence or ADF unit or individual with whom I am or have been associated in a way that might reasonably be perceived to create a conflict come before the Commission, I do not participate in decision-making and I delegate it to a Deputy Commissioner.

Henceforth, however, in relation to any future matter potentially affecting any Defence or ADF individual or unit that comes before the Commission, I propose to delegate it to a Deputy Commissioner and not participate, regardless of whether it might reasonably be perceived to involve a conflict. I am taking this measure, although I regard it as unnecessary from the perspective of properly managing conflicts, in order to avoid the Commission being distracted by further controversy.

Relationship with s 47F(1)

In particular, as I have previously declared, the s 47F(1) is one of those with whom I have had a s 47F(1) s 47F(1), such as could give rise to a perceived conflict of interest. If s 47F(1) were to be the subject of a referral to the Commission, I would not be the decision-maker, and would allocate the matter to a Deputy Commissioner, to whom my relevant powers have been delegated.

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- Mr Christian Porter, when he was Attorney-General;
- Ms Linda Reynolds, when she was Minister for Defence (I also had contact with her when she was serving in the Army Reserve as Commanding Officer, 5th Brigade Administrative Support Battalion when I was Chief of Staff 5th Brigade);
- Mr Richard Marles MP, when he was Shadow Minister for Defence, and more recently while he had been Deputy Prime Minister and Minister for Defence;
- Mr Mark Dreyfus KC MP, when he was Shadow Attorney-General, and more recently while he was Attorney-General;
- Mr Matt Thistlethwaite MP, in his capacity as Minister Assisting the Minister for Defence; and
- Yourself, in your capacity as Attorney-General.

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Yours sincerely,



The Hon PLG Brereton AM RFD SC
Commissioner

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