

UNDER

THE INQUIRIES ACT 2013

IN THE MATTER OF

A GOVERNMENT INQUIRY INTO  
OPERATION BURNHAM AND  
RELATED MATTERS

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STATUTORY DECLARATION OF REBECCA LUCY KITTERIDGE  
REGARDING DISCLOSURE

30 August 2019

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**CROWN LAW**  
TE TARI TURE O TE KARAUNA  
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Contact Person:  
Aaron Martin / Ian Auld

I, Rebecca Lucy Kitteridge of Wellington, Director-General of Security solemnly and sincerely declare that:

1. I am the Director-General of Security for the New Zealand Security Intelligence Service (NZSIS).
2. I am familiar with the subject matter of the inquiry and confirm that I am authorised by NZSIS to make this declaration on its behalf.
3. I make this statutory declaration pursuant to the Minute No. 6 of the Inquiry, dated 29 November 2018 (**Minute No 6**) where the Inquiry directed NZSIS to produce to the Inquiry any relevant material which either i) does not require the consent of an overseas partner to release to the Inquiry, or ii) in respect of which consent has been given. That minute also directed NZSIS to verify by way of statutory declaration that all relevant material within possession and control has been provided to the Inquiry<sup>1</sup>.
4. I am aware of and understand the obligations imposed by the Inquiry on NZSIS in Minute No 6.
5. I further make this statutory declaration pursuant to the order of the Inquiry dated 16 August 2019 (**the Order**) requiring all relevant material that it holds, including documents provided by overseas partners or containing information derived from overseas partners. The Order also directed NZSIS to verify by way of statutory declaration that all relevant material within possession and control has been provided to the Inquiry.
6. At the time of the Order all partner consents had been sought, but none had yet been granted. I am grateful that the Inquiry agreed to consider, after examination of the documents requiring partner consent, that most of the information was not required (or of such little relevance so as to not be required for Inquiry purposes) for production to the Inquiry.
7. For the remaining document that was considered relevant, this document required the consent of two partners, and partner consent requests were re-submitted. That

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<sup>1</sup> Minute No 6, dated 29 November 2019 at paragraph [20]

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consent was duly given, and I confirm that document has now been produced to the Inquiry.

8. A further document was identified that had already been produced but contained redactions that were in themselves information derived from overseas partners' information. Another agency has since obtained consent for the underlying partner's documents, and I confirm therefore that an un-redacted version of that document has now been produced.
9. I have limited direct knowledge of the matters covered by the Inquiry's Terms of Reference. I therefore arranged for steps to be taken within the NZSIS to search for and identify all material relevant to the Inquiry's Terms of Reference and to produce this material to the Inquiry. To the best of my knowledge and belief, the NZSIS has now produced to the Inquiry all material relevant to the Inquiry's Terms of Reference.

**AFFIRMED** at Wellington

this 30<sup>th</sup> day of August 2019

before me: Caleb Green

  
CAPT, DHS

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) Rebecca Kitteridge  
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