

UNDER

THE INQUIRIES ACT 2013

IN THE MATTER OF

A GOVERNMENT INQUIRY INTO
OPERATION BURNHAM AND
RELATED MATTERS

MEMORANDUM OF COUNSEL FOR THE CROWN

2 December 2019

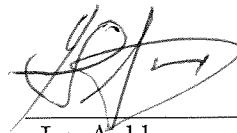
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MAY IT PLEASE THE INQUIRY:

1. In Ruling Number 1, the Inquiry confirmed the procedural protocol for review of classified information / claims to withhold information from disclosure. This procedure involves three steps:
 - 1.1 Identification and assessment of the claimed grounds for non-disclosure;
 - 1.2 Consultation with the relevant agency or agencies concerning claims; and
 - 1.3 Referral of matters to the Inquiry.
2. The Inquiry has identified a further tranche of documents relating to issues to be considered in module 2 to undergo the classification review process. The reviewers, Mr Keith and Mr Johnstone, and the relevant Crown agencies have consulted, and have agreed to the publication of the enclosed documents.

2 December 2019



Ian Auld
Counsel for the Crown