

ITEM NO.	C.12/0122	FILE REF.	A34225
SUBJECT	Proposed amendments to conditions of Development Approval – Talison Lithium Workers Accommodation Camp		
PROPONENT	Talison Lithium Australia Pty Ltd		
OFFICER	Chief Executive Officer		
DATE OF REPORT	19 January 2022		

Attachment 8 – Correspondence from Clayton Utz on behalf of Talison Lithium Pty Ltd

Reason for Urgent Business: At the SAT mediation Hearing held last Monday it was confirmed that Council would formally reconsider its decisions made with respect to the Talison Lithium Workers Accommodation Camp. Prior to this item being prepared updated documentation had to be received from the proponent and this was received late Wednesday.

OFFICER RECOMMENDATION 1

That Item C.12/0122 be accepted as urgent business.

OFFICER RECOMMENDATION 2

That Council, noting the request by the State Administrative Tribunal, reconsider its decisions made at its Special Meeting held on 9 September 2021 with specific reference to Conditions 1, 2 and 3 of the development approval for Application No. P78/2021 granted on 1 October 2021 for transient workers accommodation (camp) at Lot 3 (RSN 103) Old Mill Road, North Greenbushes

OFFICER RECOMMENDATION 3

Pursuant to the Orders made by the State Administrative Tribunal in accordance with section 31 of the State Administrative Tribunal Act 2004 Council, in relation to the development approval for Application No. P78/2021 granted on 1 October 2021 for transient workers accommodation (camp) at Lot 3 (RSN 103) Old Mill Road, North Greenbushes:

1. *Approves a variation to Condition 1 of the development approval with that condition being replaced with:

 1. *Approves an extension of the operating life of the camp to 31 March 2028 meaning the Transient Workers Accommodation camp authorised by the Approval may be used until 31 March 2028.**

2. *Approves a variation to Condition 2 of the Development Approval with that condition being replaced with:

 2. *Approval is granted for accommodation of a maximum, at any one time, of 250 construction workers involved in construction related works and expansion projects, and, subject to condition 3, does not include the**

accommodation of employees or contractors involved in operational activities.

3. *Approves a variation to Condition 3 of the Development Approval with that condition being replaced with:*

3. *In addition to the construction works authorised under condition 2, the following workers are permitted to reside at the camp provided that the maximum 250 person accommodation capacity of the camp will not be exceeded:*

(i) *Management, supervisory, professional, technical and operational personnel:*

- *Being employees who are relocating into the South West region but require transitional accommodation for a period up to six (6) months. In these instances, the employee will be permitted to occupy the camp for a maximum period of 2 months after the end of their probationary period; and*
- *Being required for maintenance shutdown activities; and*

(ii) *Undergraduate and post-graduate university students engaged in professional work-integrated learning block placement or TAFE vocational work experience students where Talison cannot source acceptable short term transitional accommodation within the Shire (and in surrounding Shires).*

4. *Approves a variation to the Development Approval by inserting a new Condition 31 regarding a complaints register being maintained for the Camp with this condition to read:*

31. *The keeping of a register for the recording of any complaints received by or notified to the approval holder concerning planning issues arising from the operation of the camp and the approval holder's response to any such complaints. The register is to be made available for inspection by Shire staff when undertaking of an inspection under Condition 27.*

OFFICER RECOMMENDATION 4

That Council approves a permanent variation to the conditions applicable for the transient workers accommodation at Lot 3 (RSN 103) Old Mill Road, North Greenbushes, to allow the accommodation of personnel in support of emergency containment and response activities in the district and surrounds. The accommodation of such personnel must be contained within the 250 person camp accommodation capacity at any given time.

Summary/Purpose

At a Special Meeting held 9 September 2021 Council approved a variation to the condition governing the eligibility criteria for workers to be permitted to reside at the Talison Lithium Workers Accommodation Camp located at Lot 3 (RSN 103) Old Mill Road, North Greenbushes.

The proponent lodged an application with the State Administrative Tribunal (SAT) seeking review of two conditions imposed by Council. These conditions, as listed on the consolidated development approval issued under the signature of the Senior Planner dated 1 October 2021 are:

Condition 1

Approval is granted for an extension of the operating life of the Transient Workers Accommodation camp from its current end date of 22 January 2022 to 31 March 2024.

Condition 3

This approval stipulates that the variation to eligibility criteria for workers to be permitted to reside at the camp doesn't include the following:

- i. Any permanent mine operations staff working at the Greenbushes mine site.
- ii. Management, supervisory and operations personnel who attend the Mine on a drive in/drive out basis but who reside locally during their period of being "on-roster".
- iii. Executive, management, supervisory, professional, technical and operations/project personnel who normally work at Talison's Perth office.
- iv. Any category permitted under Part 1(i) to (v) where the person is staying less than 7 nights.

Note the proponent is only seeking the deletion of Part iv of Condition 3, not removal of the whole condition.

Note if the variation to Condition 3 was approved a change to Condition 2 would also be necessary.

A Directions Hearing was held on 19 November 2021 attended remotely by the Shire's Manager Development Services.

A Mediation Hearing was held in Perth on 13 December 2021 and was attended in-person by the Shire's Chief Executive Officer.

A second Mediation Hearing was held in Bridgetown on 17 January 2022 and was attended in-person by Crs Boyle, Lansdell and Rose and the Chief Executive Officer.

At both Mediation Hearings the relevant issues were discussed but to a greater degree at the second Mediation. The parties did appear to reach some in-principle agreement on how to address the concerns raised by the proponent in its application to SAT.

The SAT Orders on the application include that pursuant to s31 of the State Administrative Tribunal Act the respondent (Shire) is invited to reconsider its decision at its meeting of 27 January 2022. If Council resolves not to reconsider its decision or makes a decision that isn't to the satisfaction of the proponent the matter can be expected to proceed to a hearing where the application will be determined by SAT.

The outcome of the second Mediation Hearing held on 17 January 2022 was that Council, when reconsidering the matter at its next meeting on 27 January 2022 would consider varying the existing development approval as follows:

1. That Condition 1 of the Development Approval be replaced with:

4. *The Transient Workers Accommodation camp authorised by the Approval may be used until 31 March 2028.*

5. That Conditions 2 and 3 of the Development Approval be replaced with:

2. *Approval is granted for accommodation of a maximum, at any one time, of 250 construction workers involved in construction related works and expansion projects, and, subject to condition 3, does not include the accommodation of employees or contractors involved in operational activities.*

6. *In addition to the construction works authorised under condition 2, the following workers are permitted to reside at the camp provided that the maximum 250 person accommodation capacity of the camp will not be exceeded:*

- (iii) *Management, supervisory, professional, technical and operational personnel:*
- *Being employees who are relocating into the South West region but require transitional accommodation for a period up to six (6) months. In these instances, the employee will be permitted to occupy the camp for a maximum period of 2 months after the end of their probationary period; and*
 - *Being required for maintenance shutdown activities; and*
- (iv) *Undergraduate and post-graduate university students engaged in professional work-integrated learning block placement or TAFE vocational work experience students where Talison cannot source acceptable short term transitional accommodation within the Shire (and in surrounding Shires).*

3. *That a new condition be included in the Development Approval regarding a complaints register being maintained for the Camp (as currently occurs as a matter of practice, but not obligation). For that purpose Talison recommends the wording of the condition be:*

31. *The keeping of a register for the recording of any complaints received by or notified to approval holder concerning planning issues arising from the operation of the camp and the approval holder's response to any such complaints. The register is to be made available for inspection by Shire staff when undertaking of an inspection under condition 27.*

Background

In June 2021 an application was received from Talison Lithium Pty Ltd ("Talison") seeking the following approvals with respect to its transient workers accommodation camp site (the "camp") at Lot 3 (RSN 103) Old Mill Road, North Greenbushes:

- An extension of its operating life from its current end date of 22 January 2022 to 31 March 2028

- An amendment to the conditions applicable to the camp site that currently limit accommodation to only transient construction workers from outside the local area associated with the Talison mine expansion project. The applicant is seeking a variation to allow the camp site to also accommodate various management, supervisory, professional, and technical and operations personnel.

The camp was established following approval of a development application on 20 July 2017. At the Ordinary Council Meeting held on 14 September 2017, Council resolved to support the application subject to appropriate conditions, two of which read as follows:

1. Approval was granted for the transient workers accommodation for a maximum period of two years from commencement of operation;
2. Approval was granted for accommodation of a maximum of 250 workers only at any one time, with these workers engaged specifically on the Talison Mine expansion project. Use of the accommodation and any incidental amenities by the general public or guests is prohibited.

In September 2018 Council approved an amendment to Condition 2 to specify that occupation of the camp by employees and contractors involved in overall expansion projects at the Greenbushes mine could occur, but specifically excluding occupation by any Talison mine operations staff. The 2018 resolution of Council allowed the following types of workers to be accommodated at the camp:

- Chemical Grade Plant expansions (construction of process plants and crushing circuits);
- Temporary crushing plant (construction and operation);
- Exploration/resource drilling to underwrite the expansion projects;
- Sterilisation drilling for the expansion plants and associated infrastructure locations;
- Water treatment plant and Clear water dam construction project;
- Tailings retreatment plant project;
- Mining services expansions requirements;
- Infrastructure expansions requirements;
- MSP Engineering and miscellaneous contractors supervisory and administration personnel associated with these expansion projects

All other consultants and contractors associated with other projects and head office staff employed by Talison weren't permitted to stay at the camp and had to be accommodated in local accommodation or housing.

In January 2019 the Shire received a request to amend Condition 1 above to increase the occupancy of the camp by an additional two years until 22 January 2022. This amendment was supported by Council at the Ordinary Council Meeting held on 28 March 2019.

The latest development application received in June 2021 sought amendments to conditions 1 and 2 of the original development approval. The applicant stated in its written submission that the extension of the camp's occupancy period and

occupancy of the camp by a more diverse workgroup is required to support proposed mine expansion plans that have a tentative timeline to be completed by the last quarter of the year 2027.

In its application Talison requested that the Shire grant permission for the Camp to be utilised for the housing of the following workgroups:

1. Management, supervisory, professional, technical and construction personnel associated with construction of the process/crushing plants;
2. Management, supervisory, professional, technical and construction personnel associated with other Mine expansion construction activities (e.g. MSA, MAR, TSFs etc.);
3. Management, supervisory, professional, technical and operations personnel who are relocating into the South West region but require transitional accommodation for a period of up to six (6) months;
4. Management, supervisory, professional, technical and operations maintenance shutdown personnel;
5. Undergraduate and post-graduate university students engaged in professional work-integrated learning block placement or vocational work where Talison cannot source short term transitional accommodation within the Shire (and in surrounding shires);
6. Executive, management, supervisory, professional, technical and operations/project personnel who normally work at Talison's Perth office; and
7. Management, supervisory and operations personnel who attend the Mine on a drive in/drive out basis but who reside locally during their period of being "on-roster".

Upon its receipt the application was advertised in accordance with the Town Planning Scheme and relevant Planning Regulations. Letters were sent to adjoining properties, a public notice was displayed on the Shire's noticeboards and on the Shire's website. A total of seven submissions were received, with two submissions being in support of the application and five opposed.

Details of the submissions and other background information can be accessed by reading the minutes of the Special Council Meeting held 9 September 2021.

At its meeting held 9 September 2021 Council resolved:

SpC.01/0921 b In relation to the transient workers accommodation (camp) at Lot 3 (RSN 103) Old Mill Road, North Greenbushes, Council:

1. *Notes the submissions received on the current proposal from Talison Lithium Australia Pty Ltd to extend the operating life of the camp and amend the eligibility criteria for workers to be permitted to reside at the camp.*
2. *Approves an extension of the operating life of the camp from its current end date of 22 January 2022 to 31 March 2024.*

SpC.01/0921 e In relation to the transient workers accommodation (camp) at Lot 3 (RSN 103) Old Mill Road, North Greenbushes, Council:

1. Approves a variation to the condition governing the eligibility criteria for workers to be permitted to reside at the camp to include the following:
 - i. Management, supervisory, professional, technical and construction personnel associated with construction of the process/crushing plants;
 - ii. Management, supervisory, professional, technical and construction personnel associated with other Mine expansion construction activities (e.g. MSA, MAR, TSFs etc.);
 - iii. Management, supervisory, professional, technical and operations personnel who are relocating into the South West region but require transitional accommodation for a period of up to six (6) months. In these instances the employee will be permitted to occupy the camp for a maximum period of 2 months after the end of their probationary period;
 - iv. Management, supervisory, professional, technical and operations maintenance shutdown personnel;
 - v. Undergraduate and post-graduate university students engaged in professional work-integrated learning block placement or vocational work where Talison cannot source short term transitional accommodation within the Shire (and in surrounding Shires); and
2. Stipulates that the variation to eligibility criteria for workers to be permitted to reside at the camp doesn't include the following:
 - v. Any permanent mine operations staff working at the Greenbushes mine site.
 - vi. Management, supervisory and operations personnel who attend the Mine on a drive in/drive out basis but who reside locally during their period of being "on-roster".
 - vii. Executive, management, supervisory, professional, technical and operations/project personnel who normally work at Talison's Perth office.
 - viii. Any category permitted under Part 1(i) to (v) where the person is staying less than 7 nights.
3. A site decommissioning and/or transition plan shall be submitted for approval by the Shire of Bridgetown-Greenbushes and the approved plan shall be implemented within six months of the expiry date of the operating life of the camp.
4. Provides advice to the proponent and owner of Lot 3 (RSN 103) Old Mill Road, North Greenbushes that it is Council's determination that although the property has an area of 49.2043 hectares it is Council's view that the mine camp is a non-rural use and is the predominant use of the property and accordingly the rating basis of the property is to be changed from 'unimproved value (UV)' to 'gross rental value (GRV)'.

In its application to SAT the proponent lists the grounds of review as:

- 1) The variation of Condition 1 (to extend the Approval to 31 March 2028) and the deletion of Condition 3(iv) of the Approval is consistent with the orderly and proper planning of the locality and will not have an adverse impact on the amenity of the locality.

- 2) The objectors' economic competition concerns do not constitute the limited class of planning considerations identified by the High Court of Australia in *Kentucky Fried Chicken Pty Ltd v Gantidis* (1979) 140 CLR 675.
- 3) No proper planning purpose is served by:
 - a) [condition1] not extending the term of the Approval to 31 March 2028 in circumstances where the Talison mine expansion project is projected to extend beyond the approved period of 31 March 2024; and
 - b) [condition 3(iv)] excluding the accommodation of relevant transient workers for the expansion project in circumstances only where the period of temporary accommodation is less than 7 days.
- 4) The imposition of Condition 3(iv) is unreasonable, in that:
 - a) The 7 night limitation is arbitrary and not connected in any way with planning and amenity impacts on the locality;
 - b) There is evidence of a shortage of temporary accommodation within the district and region, such that there is a risk that accommodation may not be available for workers staying for less than 7 nights;
 - c) There is no structured or logical basis for the imposition of this restriction;
 - d) No consideration has been given to how this limitation will impact upon the Applicant's ability to effectively manage and support transient workers for the Talison mine expansion project;
 - e) Usage records for the approved transient worker accommodation facility during this period January 2020 to August 2021 indicates that almost a quarter of stays were for less than 7 nights; and
 - f) Talison Mine expansion project work can, in some cases, be staged to be undertaken on a Monday to Friday (i.e. 5 days per week) basis and the 7-night limitation would preclude these workgroups from being able to use the approved facility.

Officer Comment

At the mediation held 17 January 2022 the following points appear to have been accepted by the Shire representatives in its discussion with the proponent and its legal representatives and separately with the SAT Member presiding the Mediation Hearing:

- That it is reasonable to expect that the length of the development approval for the camp should be linked to the need for the camp which in itself is linked to the lifespan of the Talison mine expansion project. Council, when granting its initial development approval for the camp in 2017 conditioned it on a 2 year lifespan which at the time was the expected duration of the Talison mine expansion project. Now that the project has extended out to 2028 and the need to accommodate contractors remains it would be expected that the life of the camp's development approval should be linked to the duration of the mine expansion project.
- That the imposition of a 7-night limitation on staying at the camp was not in keeping with established town planning law in that Council had based this condition solely on economic competition reasons. Note this is confirmed by the reason given by Council for determining contrary to the officer recommendation at its Special Council Meeting of 9 September 2021, being

that the reason given was that Council was “responding to concerns raised by local accommodation providers”.

At the second Mediation Hearing the Shire representatives sought a commitment from Talison that there be some opportunity for the Shire to be made aware of any complaints made about the camp and that the company would keep Council informed on the operations of the camp. This is the basis for the new Condition 31 being proposed.

Under existing Condition 27 Shire staff are able to undertake periodic inspections of the camp and surrounding area and provide written notification to the camp manager of any breaches or problems identified during the inspection with these breaches or problems being rectified within an agreed timeframe.

The intent of the new Condition 31 is that when undertaking the inspections permitted under Condition 27 the Shire staff can inspect the complaints register. If a matter in the complaints register is determined by the Shire staff member to be a breach or problem the staff member can provide written notification to the camp manager for these to be rectified.

Responding to the request made by the Shire representatives for Talison keeping Council informed on the operations of the camp Talison has agreed to provide bi-annual presentations to Council. Although the presentations will cover wider operations and the whole of the expansion project any issues concerning the camp can be included in these bi-annual presentations. It isn't proposed that the providing of bi-annual presentations be made a new condition of the development approval but that it is a commitment from the company and in essence is a continuation of current practice by Talison in keeping Council informed of the expansion project.

Finally Talison, outside of the SAT application, is seeking clarification from Council on whether the camp can continue to be used to accommodate “personnel in support of emergency containment and response activities in the district and surrounds”. In February 2021 Council resolved:

C.02/0221 That Council approves a temporary variation to the conditions applicable for the transient workers accommodation at Lot 3 (RSN 103) Old Mill Road, North Greenbushes, to allow the accommodation of personnel in support of emergency containment and response activities in the district and surrounds. This variation is to apply on a trial basis until 22 January 2022, being the expiry date of the current development approval for the transient workers accommodation at Lot 3 (RSN 103) Old Mill Road, North Greenbushes.

It is recommended that Council approve the continuation of this use on the condition that any accommodation of “personnel in support of emergency containment and response activities in the district and surrounds” can only occur within the 250 person camp accommodation capacity. If Council agrees with this recommendation this approval needs to be determined separately to the reconsideration decisions (as it not a matter relating to the SAT application), hence it is addressed in a separate recommendation.

Statutory Environment

Section 31 State Administrative Tribunal Act 2004

31. *Tribunal may invite decision-maker to reconsider decision*

- (1) At any stage of a proceeding for the review of a reviewable decision, the Tribunal may invite the decision-maker to reconsider the decision.
- (2) Upon being invited by the Tribunal to reconsider the reviewable decision, the decision-maker may —
 - (a) affirm the decision; or
 - (b) vary the decision; or
 - (c) set aside the decision and substitute its new decision.
- (3) If the decision-maker varies the decision or sets it aside and substitutes a new decision, unless the proceeding for a review is withdrawn it is taken to be for the review of the decision as varied or the substituted decision.

Integrated Planning

- Strategic Community Plan
 - Outcome 7 – responsible and attractive growth and development
 - Objective 7.1 – Plan for a diverse range of land, housing and development opportunities to meet current and future needs
 - Objective 7.2 – advocate for adequate infrastructure to support responsible growth
 - Outcome 10 – a strong, diverse and resilient economy
 - Objective 10.1 – strengthen the Shire of Bridgetown-Greenbushes competitive advantage to attract new businesses and investors to the area
 - Objective 10.3 – support local business to thrive
- Corporate Business Plan
 - Objective 10.1 – strengthen the Shire of Bridgetown-Greenbushes competitive advantage to attract new businesses and investors to the area
 - Action 10.1.1 – Provide an annual review of the Growth Strategy to drive population growth, create jobs and generate economic development
- Long Term Financial Plan – Not applicable
- Asset Management Plans – Not applicable
- Workforce Plan – Not applicable
- Other Integrated Planning - Nil

Policy Implications – Nil

Budget Implications

In the event of a mediated outcome not being achieved and the SAT application proceeding to a formal hearing Council would in all likelihood have to engage

specialist legal representation or representation from a town planning consultant familiar with the procedures of a SAT hearing. The estimated costs are difficult to quantify but could be upwards of \$15,000.

Whole of Life Accounting - Nil

Risk Management

There has been concerns raised to the approval of the amendments by members of the community. If this application is supported, it is likely the Shire may receive some criticism from residents/business owners. However Council must have regard to the principles of orderly and proper planning and shouldn't use commercial competition as a reason to limit specific development proposals.

The mine expansion project is the largest economic driver in the Shire. The Shire has been working with Talison to ensure that economic benefits are spread locally.

In the event of a mediated outcome not being achieved and the SAT application proceeding to a formal hearing Council would in all likelihood have to engage specialist legal representation or representation from a town planning consultant familiar with the procedures of a SAT hearing.

Voting Requirements – Simple Majority (note revocation of Council Resolutions SpC.01/0921b and SpC.01/0921e isn't required).

Confidential
Without prejudice

Email

19 January 2022

Mr Tim Clynch
Chief Executive Officer
Shire of Bridgetown-Greenbushes
PO Box 271
BRIDGETOWN WA 6255

tClynch@bridgetown.wa.gov.au

Dear Tim

**Amendment of development approval for workers accommodation camp
State Administrative Tribunal DR 235 of 2021
Lot 3 (RSN 103) Old Mill Road, North Greenbushes WA 6254**

I refer to the State Administration Tribunal mediation conference held on Monday at the Shire of Bridgetown-Greenbushes (**Shire**) offices.

As you know, the outcome of the mediation was that Council, when reconsidering this matter on Thursday, 27 January 2022 pursuant to s. 31 of the *State Administrative Tribunal Act 2004* (WA), consider varying the existing development approval as follows:

1. That conditions 1 of the Development Approval be replaced with:

1. *The Transient Workers Accommodation camp authorised by the Approval may be used until 31 March 2028.*

2. That conditions 2 and 3 of the Development Approval be replaced with¹:

2. *Approval is granted for accommodation of a maximum, at any one time, of 250 construction workers involved in construction related works and expansion projects, and, subject to condition 3, does not include the accommodation of employees or contractors involved in operational activities.*
3. *In addition to the construction works authorised under condition 2, the following workers are permitted to reside at the camp provided that the maximum 250 person accommodation capacity of the camp will not be exceeded:*
 - (i) *management, supervisory, professional, technical and operational personnel:*
 - *being employees who are relocating into the South West region but require transitional accommodation for a period of up to six (6) months. In these instances, the employee will be permitted to occupy the camp for a maximum period of 2 months after the end of their probationary period; and*
 - *being required for maintenance shutdown activities; and*

¹ Please note that, for improved clarity, the reference in proposed condition 3(ii) to students undertaking vocational work has been amended to TAFE vocational work experience students.

- (ii) *undergraduate and post-graduate university students engaged in professional work-integrated learning block placement or TAFE vocational work experience students where Talison cannot source acceptable short term transitional accommodation within the Shire (and in surrounding Shires).*

3. That a new condition be included in the Development Approval regarding a complaints register being maintained for the Camp (as currently occurs as a matter of practice, but not obligation). For that purpose Talison Lithium recommends the wording of that condition being:

- 31. *The keeping of a register for the recording of any complaints received by or notified to approval holder concerning planning issues arising from the operation of the camp and the approval holder's response to any such complaints. The register is to be made available for inspection by Shire staff when undertaking of an inspection under condition 27.*

It was agreed by the parties that Talison Lithium Australia Pty Ltd (**Talison**) would provide this letter, which we are instructed to provide.

Talison is agreeable to the imposition of a new condition (in terms of the above proposed condition 31) if Council varies the development approval as described above.

Talison also recognises Council's desire for Talison to provide to the Council bi-annual presentations, in private sessions, at mutually agreed times, concerning the operation of the Camp. These presentations will occur in conjunction with presentations to the Council by Talison concerning its wider operations and will address the extent of short-stay accommodation usage within the local and surrounding districts by Talison employees involved in mine-site operations (as distinct from construction operations).

Further, as agreed, Talison is separately making arrangements with you for Shire Councillors and staff to tour the Camp next week.

Finally, I wish to raise, by way of seeking confirmation, a matter that is not otherwise raised in the amendment application, the State Administrative Tribunal review or the mediation conferences that have been held to date. That matter is the temporary variation of the development approval, on a trial basis, until 22 January 2022 for the use of the Camp, as required, for *"the accommodation of personnel in support of emergency containment and response activities in the district and surrounds"*. You may recall that Council approved this temporary variation at its ordinary council meeting held on 25 February 2021.

As you may be aware, the Camp was utilised on 10 December 2021, for an initial assembly of a strike crew in response to the fire in the Margaret River region. Talison considers the use of the Camp in this way by emergency responders provided a community benefit. Accordingly, Talison seeks the extension of this emergency use during any period that the Camp continues to operate.

Please contact me if you have any queries regarding the above or require any further information.

Yours sincerely



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