

NOTICE OF FILING

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MINISTER FOR RESOURCES AND MINISTER FOR NORTHERN
AUSTRALIA (COMMONWEALTH) &ORS
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



Sia Lagos

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.

STATEMENT OF AGREED FACTS



No. NSD 1056 of 2024

Federal Court of Australia
District Registry: New South Wales
Division: General

Energy Resources of Australia Ltd ABN 71 008 550 865

Applicant

Minister for Resources and Minister for Northern Australia (Commonwealth) and others
named in the Schedule

Respondents

A. Introduction

1. This Statement of Agreed Facts will be used as evidence in the proceeding in accordance with s 191 of the *Evidence Act 1995* (Cth), each fact being an “agreed fact” within the meaning of s 191(1) of that Act. Agreement to these facts is for the purpose of this proceeding only, and does not convey agreement as to the relevance of any of those facts to the issues in this proceeding or a concession that the facts agreed are able to be verified independently. Where documents are annexed to the statement of agreed facts, the parties agree that the annexures are true copies of the documents described, but do not necessarily agree that facts asserted in those documents are true.
2. This document is divided into the following sections (noting that headings in this document do not constitute agreed facts):
 - a) **Section B** details the relevant agreements to these proceedings;
 - b) **Section C** outlines the interactions between the Applicant and stakeholders in relation to its application for the renewal of Jabiluka MLN1;
 - c) **Section D** outlines the Advice and Renewal Decisions;
 - d) **Section E** details materials that were received by the relevant decision-makers prior to the Advice and Renewal Decisions;

Filed on behalf of	Energy Resources of Australia Ltd ABN 71 008 550 865, Applicant
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- e) **Section F** outlines material that was disclosed to the Applicant;
 - f) **Section G** details the contemporaneous communications with and subsequent to the Renewal Decision;
 - g) **Section H** details public statements made by the parties with respect to Jabiluka MLN1.
3. Subject to the requirements of s 191(2) of the *Evidence Act 1995* (Cth), the parties agree that the mere reference to an event or occurrence in this document does not preclude any party adducing further or other evidence in addition to, or expansion upon, the agreed facts herein.
4. The parties agree that not every fact in this document is relevant to, or within the knowledge of, each respondent to the proceedings. To the extent a fact in this document is not relevant to and/or is beyond the knowledge of a particular respondent, it is “agreed” by that respondent for the purposes of these proceedings only in the sense that the respondent does not and will not dispute it in the proceedings (consistently with the terms of s 191(1) of the *Evidence Act 1995* (Cth)).
5. Where in this document it is admitted that an action was not taken, that admission does not constitute a concession by any party that there was a duty or obligation to perform that action. Where applicable and unless the context otherwise indicates, capitalised terms used in this document which are not otherwise defined have the meaning set out in the Applicant’s Originating Application dated 6 August 2024.

B. Jabiluka MLN1 and related documents

6. The area of land known as the Pancontinental Project Area or Jabiluka Project Area (the **Jabiluka Project land**) is Aboriginal land within the meaning of the *Aboriginal Land Rights (Northern Territory) Act 1976* (Cth).
7. The Fifth Respondent, the Jabiluka Aboriginal Land Trust, is a Land Trust established under the Land Rights Act that holds title to the Jabiluka Project land in accordance with that Act.
8. The Sixth Respondent, the Northern Land Council, is a Land Council established under the *Land Rights Act* for the area of the northern half of the Northern Territory that includes the Jabiluka Project land.
9. On about 21 July 1982, an agreement was made between the Sixth Respondent, Pancontinental Mining Limited and Getty Oil Development Company Limited (together, **Pancontinental**) in respect of the Jabiluka Project in accordance with former section 43 of the *Land Rights Act* (**Section 43 Agreement**).

10. On about 12 August 1982, the Fourth Respondent, the Northern Territory of Australia, granted to Pancontinental a mineral lease pursuant to the *Mining Act 1980* (NT) in respect of the Jabiluka Project land for the term of 42 years for the purpose of mining uranium ore, expiring on 11 August 2024, being Mineral Lease No. ML N1 (**Jabiluka MLN1**). A copy of MLN1 is Annexure A to this Statement of Agreed Facts.
11. On about 6 August 1991, the Applicant, Energy Resources of Australia Ltd, purchased the Jabiluka Project, including Jabiluka MLN1, from Pancontinental.
12. On about 21 August 1991, Pancontinental assigned all of their right, title and interest under the Section 43 Agreement to the Applicant, except for Pancontinental's rights as operator of the Jabiluka Project. On the same date, the Applicant made a deed poll in favour of the Sixth Respondent undertaking to assume and comply with all of the obligations of Pancontinental under the Section 43 Agreement.
13. On about 24 December 1991, the Applicant and the Sixth Respondent entered into an agreement by which the Sixth Respondent consented to the assignment to the Applicant of the rights of the operator of the Jabiluka Project. A copy of that agreement is Annexure B to this Statement of Agreed Facts.
14. On about 26 May 1998, the Applicant executed a **Deed Poll** in favour of the Sixth Respondent in relation to the Jabiluka Project. A copy of the Deed Poll is Annexure C to this Statement of Agreed Facts.
15. On about 17 November 2000, the Second Respondent, the Commonwealth of Australia, and the Fourth Respondent entered into an Agreement titled "Agreement between the Commonwealth of Australia and the Northern Territory of Australia in relation to Principles to be applied in the Regulation of Uranium Mining in the Northern Territory of Australia" (**Intergovernmental Agreement**). A copy of the Intergovernmental Agreement is Annexure D.
16. On about 25 February 2005, the Applicant, Traditional Aboriginal Owners of the Jabiluka Project land, and the Sixth Respondent, made an agreement titled "Jabiluka Long Term Care and Maintenance Agreement" (**LTCMA**). A copy of the LTCMA is Annexure E to this Statement of Agreed Facts.
17. On about 23 December 2009, the Fourth Respondent and the Applicant made an agreement pursuant to s 172 of the *Mining Act 1980* (NT) referred to herein as the **Waiver Agreement**. A copy of the Waiver Agreement is Annexure F to this Statement of Agreed Facts.
18. On 15 February 2024, the First Respondent sent a letter to the Third Respondent. The letter (which is dated 14 February 2024) is Annexure G to this Statement of Agreed Facts.

19. On 8 March 2024, the Third Respondent sent a letter in response to the First Respondent. The 8 March 2024 letter is Annexure H to this Statement of Agreed Facts
20. On 5 June 2024, the Fourth Respondent published the *General Reservation of Land on Cessation of Title (RL 33778)* in the Government Gazette. The 5 June 2024 Gazettal is Annexure I to this Statement of Agreed Facts.
21. On 17 July 2024, the Third Respondent sent a letter to the First Respondent. The 17 July 2024 letter is Annexure J to this Statement of Agreed Facts.
22. On 19 July 2024, the First Respondent sent a letter to the Third Respondent. The 19 July 2024 letter is Annexure K to this Statement of Agreed Facts.

C. Interactions between the Applicant and various stakeholders in relation to the Application prior to the Advice and Renewal Decisions

23. On 13 March 2023, Anne Tan (Deputy Chief Executive Officer Mining and Energy, Department of Industry, Tourism and Trade of the Fourth Respondent) sent an email to Mr Brad Welsh, Chief Executive Officer of the Applicant. The 13 March 2023 email is Annexure L to this Statement of Agreed Facts.
24. On 10 November 2023, the Australian Financial Review published an interview with the Applicant's Chief Executive Officer Brad Welsh. A copy of the article is Annexure M to this Statement of Agreed Facts.
25. Between 6 February and 8 February 2024, representatives of the Applicant, including Mr Welsh, met with various officers of the Second Respondent in Canberra in respect of the renewal of Jabiluka MLN1. Those officers included:
 - a) Georgia Tree, Senior Adviser to the First Respondent;
 - b) Dave McElrea, Deputy Chief of Staff to the Minister for the Environment and Water; and
 - c) Kym Moore, Angela Kraatz, Erin Cockram and Peter Chesworth from the Commonwealth Department of Industry, Science and Resources.
26. On 20 March 2024, the Applicant submitted the Application to the Northern Territory Mineral Titles Office seeking renewal of Jabiluka MLN1 for a further term of 10 years.
27. On 3 April 2024 at 9.58am, Ms Moore returned a missed call from Mr Welsh received on 2 April 2024.
28. On 10 May 2024, Mr Welsh received a letter from the First Respondent. The 10 May 2024 letter is Annexure N to this Statement of Agreed Facts.

29. On 26 June 2024, representatives of the Applicant, including Mr Welsh, met with the First Respondent, Ms Moore, Ms Tree and Cecilia Tran (adviser of the First Respondent) in Canberra to discuss the Application.

D. The Advice Decision and the Renewal Decision

The Advice Decision

30. On or about 19 July 2024, the Northern Territory Department of Industry, Tourism and Trade provided a brief of materials to the Third Respondent regarding the Application (**NT Minister's Brief**). The NT Minister's Brief is Annexure O to this Statement of Agreed Facts.
31. On 23 July 2024, the Third Respondent sent a letter to the First Respondent. The 23 July 2024 letter is Annexure P to this Statement of Agreed Facts.
32. Between about 4:21pm and 5:03pm on 25 July 2024, the First Respondent received a ministerial brief from the Department of Industry, Science and Resources titled "Jabiluka Mineral Lease Renewal Application – Advice to the Northern Territory Minister for Mining" (MS24-000911) (**Commonwealth Ministerial Brief**). The Commonwealth Ministerial Brief is Annexure P1 to this Statement of Agreed Facts.
33. At or around this time, the First Respondent also received an advice dated 24 July 2024 from Marie Illman (Deputy Chief of Staff to the First Respondent) and Ben Latham (Parliamentary Advisor to the First Respondent). The 24 July 2024 document is Annexure Q to this Statement of Agreed Facts.
34. On or about 25 July 2024, the First Respondent made the Advice Decision. The First Respondent sent a letter to the Third Respondent. The 25 July 2024 letter is Annexure R to this Statement of Agreed Facts.

The Renewal Decision

35. On or about 26 July 2024, the Third Respondent received a recommendation from the Northern Territory Department of Industry, Tourism and Trade titled "Decision on Renewal of Mineral Lease Northern 1 – Jabiluka". The recommendation is Annexure S to this Statement of Agreed Facts.
36. On or around 26 July 2024, the Third Respondent made the Renewal Decision referred to in 35 above.

E. Materials relating to renewal of Jabiluka MLN1

Material received by the First and/or Second Respondents before the Advice Decision

37. In the period from December 2022 to July 2024, the First Respondent received information and material including through the following means:
- a) A meeting between the Gundjeihmi Aboriginal Corporation (**GAC**), the First Respondent, the Prime Minister, the Minister for the Environment and Water of Australia (**Minister Plibersek**) and the Hon Peter Garrett AM on 13 February 2023.
 - b) A letter from the GAC to the First Respondent which was sent on 24 February 2023. At no time prior to either the Advice Decision or the Renewal Decision was a copy of this letter provided to the Applicant by the First Respondent or the Second Respondent's Department of Industry, Science and Resources.
 - c) A letter from Ms Thalia van den Boogaard (CEO of the GAC) which was sent on behalf of Ms Margarula to the Hon Eva Lawler, Chief Minister of the Northern Territory (**NT Chief Minister**) on 14 March 2024 and copied to the First Respondent, the Third Respondent and Matthew Ryan (Chairperson of the Sixth Respondent). At no time prior to either the Advice Decision or the Renewal Decision was a copy of this letter provided to the Applicant by the First Respondent or the Second Respondent's Department of Industry, Science and Resources.
 - d) A meeting between the First Respondent and Mirarr Traditional Owners on 20 March 2024.
 - e) A letter from Ms van den Boogaard on behalf of the GAC, which was sent to the NT Chief Minister on 9 April 2024 and copied to the Prime Minister, the First Respondent, the Third Respondent and Minister Plibersek. At no time prior to either the Advice Decision or the Renewal Decision was a copy of this letter provided to the Applicant by the First Respondent or the Second Respondent's Department of Industry, Science and Resources.
 - f) A letter from Ms Margarula on behalf of the GAC which was sent to the First Respondent and the Third Respondent on 9 July 2024. At no time prior to either the Advice Decision or the Renewal Decision was a copy of this letter provided to the Applicant by the First Respondent or the Second Respondent's Department of Industry, Science and Resources.
 - g) A letter from the Hon Peter Garrett AM and Professor Don Henry AM which was sent to the First Respondent and Third Respondent on 17 July 2024 and copied to the Prime Minister and the Hon Linda Burney, the then Minister for Indigenous

Australians. At no time prior to either the Renewal Decision or the Advice Decision was a copy of this letter provided to the Applicant by the First Respondent or the Second Respondent's Department of Industry, Science and Resources.

38. The First Respondent did not receive:
- a) A letter from Yvonne Margarula which was sent to the Hon Anthony Albanese, Prime Minister of Australia (**Prime Minister**) in December 2022.
 - b) A letter from Justin O'Brien (then CEO of the GAC) which was sent to the Prime Minister on 23 February 2023.
 - c) A letter from the GAC to Minister Plibersek which was sent on 23 February 2023.
 - d) A letter from Ms Yvonne Margarula on behalf of the GAC which was sent to the Prime Minister and copied to Joe Martin-Jard, then-CEO of the Sixth Respondent on 10 January 2024.
39. The documents before the First Respondent at the time she made the Advice Decision comprised:
- a) the advice from Ms Illman and Mr Latham to the First Respondent dated 24 July 2024, referred to at paragraph 33 above;
 - b) the Commonwealth Ministerial Brief, which included the following attachments:
 - (i) the Application and supporting letter from the Applicant (attached to the letter from the Third Respondent referred to in paragraph 31 above);
 - (ii) a letter from the Sixth Respondent described in paragraph 40.j) (attached to the letter from the Third Respondent referred to in paragraph 31 above), which was described in the Commonwealth Ministerial Brief as the "Northern Land Council submissions";
 - (iii) the letters from the GAC described in paragraphs 40.g), 40.i) and 40.l) below;
 - (iv) a document described as "Context and key policy considerations";
 - (v) a series of three draft letters on the First Respondent's letterhead, each of which reflected a different "option" in response to the Third Respondent's request;
 - (vi) a document described as "Legal considerations"; and
 - (vii) an advice from the Australian Government Solicitor dated 23 July 2024.

Material received by the Third and/or Fourth Respondents before the Renewal Decision

40. The following information and material, which are Annexure T to this Statement of Agreed Facts (as a bundle), was available to the Third Respondent and/or his Department:
- a) A letter from Ms Margarula on behalf of the GAC which was sent to Minister Manison and copied to Samuel Bush-Blanas (then Chairperson of the Sixth Respondent) on 22 December 2022.
 - b) A letter from Mr O'Brien on behalf of the GAC which was sent to Minister Manison on 8 March 2023.
 - c) A letter from Minister Manison to Ms Margarula dated 28 March 2023.
 - d) A letter from Ms Margarula on behalf of the GAC which was sent to the Hon Chanston Paech MLA (then Northern Territory Minister for Arts, Culture and Heritage) (**Minister Paech**) on 24 October 2023 and was copied to Minister Manison and Mr Martin-Jard.
 - e) A letter from Ms Yvonne Margarula on behalf of the GAC which was sent to the NT Chief Minister and was copied to the Third Respondent and Mr Martin-Jard on 18 January 2024, and which attached the letters referred to at 40(a), (b) and (d) above.
 - f) A letter from the GAC which was sent to Denise Turnbull, Director Mineral Titles in the Northern Territory Department of Industry Tourism and Trade on 1 March 2024.
 - g) A letter from Ms van den Boogaard which was sent on behalf of Ms Margarula to the NT Chief Minister on 14 March 2024 and copied to the First Respondent, the Third Respondent and Mr Ryan.
 - h) Email from the Northern Territory Department of Industry, Tourism and Trade regarding the process for renewing Jabiluka MLN1 which was sent by email to the Third Respondent's office on 27 March 2024.
 - i) A letter from Ms van den Boogaard on behalf of the GAC, which was sent to the NT Chief Minister on 9 April 2024 and copied to the Prime Minister, the First Respondent, the Third Respondent and Minister Plibersek.
 - j) A letter from Ms Jessie Schaecken (interim CEO of the Sixth Respondent), which was sent to Ms Turnbull on 8 May 2024.
 - k) Email from the Northern Territory Department of Industry, Tourism and Trade sent by email to the Third Respondent's office on 10 May 2024.

- l) A letter from Ms Margarula on behalf of the GAC which was sent to the First Respondent and the Third Respondent on 9 July 2024.
 - m) A letter from the Hon Peter Garrett AM and Professor Don Henry AM which was sent to the First Respondent and Third Respondent on 17 July 2024 and copied to the Prime Minister and the Hon Linda Burney, the then Minister for Indigenous Australians.
41. The brief to the Third Respondent at the time he made the Renewal Decision included:
- a) the recommendation from the Northern Territory Department of Industry, Tourism and Trade to the Third Respondent on or about 26 July 2024 to refuse to renew Jabiluka MLN1, referred to at 35 above;
 - b) the letter from the First Respondent to the Third Respondent dated 25 July 2024, referred to at 34 above; and
 - c) draft letters advising each of the Fifth and Sixth Respondents, Applicant and Ms Margarula of the Renewal Decision.

F. Disclosure to the Applicant

The Advice Decision

42. At all times prior to the making of the Advice Decision, the First Respondent and the Second Respondent (by its Department of Industry, Science and Resources) did not provide to the Applicant the following documents:
- a) the letter from the GAC to the First Respondent dated 24 February 2023 referred to at 37.b) above;
 - b) the letter from the GAC which was copied to the First Respondent dated 14 March 2024, referred to at 37.c) above;
 - c) the letter from the GAC which was copied to the First Respondent dated 9 April 2024, referred to at 37.e) above;
 - d) the letter from the GAC which was copied to the First Respondent dated 9 July 2024, referred to at 37.f) above; and
 - e) the letter from the Hon Peter Garrett AM and Professor Don Henry AM which was copied to the First Respondent dated 17 July 2024, referred to at 37.g) above.

The Renewal Decision

43. Prior to the making of the Renewal Decision, the Third Respondent did not provide the following documents to the Applicant:

- a) the advice from Minister Manison dated 22 December 2022 referred to at 40.a) above;
- b) the letter from the GAC to Minister Manison dated 22 December 2022 referred to at 40.a) above;
- c) the letter from the GAC to Minister Manison dated 8 March 2023 referred to at 40.b) above;
- d) the letter from the GAC to Minister Paech dated 24 October 2023 referred to at 40.d) above;
- e) the letter from the GAC to the NT Chief Minister dated 18 January 2024 referred to at 40.e) above;
- f) the letter from the GAC to the Director Mineral Titles in the Northern Territory Department of Industry Tourism and Trade dated 1 March 2024 referred to at 40.f) above;
- g) the letter from the GAC to the NT Chief Minister dated 14 March 2024 referred to at 40.g) above;
- h) the email from the Department of Industry, Tourism and Trade on 27 March referred to at 40.h) above;
- i) the letter from the GAC to the NT Chief Minister dated 9 April 2024 referred to at 40.i) above;
- j) the letter from the Sixth Respondent to the Director Mineral Titles in the Northern Territory Department of Industry Tourism and Trade dated 8 May 2024 referred to at 40.j) above;
- k) the email from the Northern Territory Department of Industry, Tourism and Trade regarding the Application dated 10 May 2024 referred to at 40.k) above;
- l) the letter from the GAC to the First Respondent dated 9 July 2024 referred to at 40.l) above; and
- m) the letter from the Hon Peter Garrett AM and Professor Don Henry AM to the First and Third Respondents dated 17 July 2024 referred to at 40.m) above.

G. Interactions between the Applicant, the First Respondent and the Third Respondent subsequent to the Renewal Decision

44. At about 11.54 am on 26 July 2024, Mr Welsh received a phone call from the Third Respondent advising that he was going to refuse the Application.

45. The Third Respondent sent a letter to Mr Welsh dated 26 July 2024 advising that he had made the Renewal Decision and that the Application had been refused. The 26 July 2024 letter is Annexure U to this Statement of Agreed Facts.
46. The Third Respondent sent letters dated 26 July 2024 to the Sixth Respondent, the Fifth Respondent and the GAC, notifying each of them of the Renewal Decision. Those letters are Annexure V to this Statement of Agreed Facts.
47. Also on 26 July 2024, Mr Welsh sent a letter on behalf of the Applicant to the Third Respondent. The 26 July 2024 letter is Annexure W to this Statement of Agreed Facts.
48. On 1 August 2024, Mr Welsh sent a letter on behalf of the Applicant to the Third Respondent. The 1 August 2024 letter is Annexure X to this Statement of Agreed Facts.
49. On 2 August 2024, Ms Tan sent a letter to the Applicant on behalf of the Third Respondent. The 2 August 2024 letter is Annexure Y to this Statement of Agreed Facts.
50. On 3 August 2024, Mr Welsh sent a letter on behalf of the Applicant to the First Respondent. The letter is Annexure Z to this Statement of Agreed Facts.

H. Public statements in respect of Jabiluka MLN1

51. On 9 April 2022, GAC issued a media release titled “Mirarr welcome Ranger clean up commitment from Rio Tinto”. The media release is Annexure AA to this Statement of Agreed Facts.
52. On 28 July 2022, GAC issued a media release titled “Jabiluka deposit will never be mined”. The media release is Annexure BB to this Statement of Agreed Facts.
53. On 26 September 2022, the Applicant issued an announcement to the ASX titled “Independent Expert’s Report Received”. The announcement is Annexure CC to this Statement of Agreed Facts
54. On 28 September 2022, GAC issued a media release titled “Mining report flags sacred site destruction”. The media release is Annexure DD to this Statement of Agreed Facts.
55. On 10 October 2022, GAC issued a media release titled “ERA minorities completely wrong on Jabiluka”. The media release is Annexure EE to this Statement of Agreed Facts.
56. On 26 February 2023, GAC issued a media release titled “Rio downgrades Jabiluka, why won’t ERA?”. The media release is Annexure FF to this Statement of Agreed Facts.
57. On 1 September 2023, GAC issued a media release titled “Jabiluka’s permanent protection a key test of Australia’s heritage laws”. The media release is Annexure GG to this Statement of Agreed Facts.

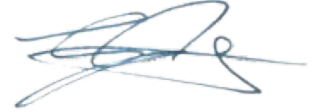
58. On 19 March 2024, GAC issued a media release titled “GAC corrects recent reporting by Energy Resources of Australia Ltd”. The media release is Annexure HH to this Statement of Agreed Facts.
59. On 20 March 2024, the Applicant issued an announcement to the ASX titled “ERA lodges application for renewal of Jabiluka Lease”. The announcement is Annexure II to this Statement of Agreed Facts.
60. On 21 March 2024, GAC issued a media release titled “Empty words with a \$2 billion dollar price tag from Kakadu uranium miner”. The media release is Annexure JJ to this Statement of Agreed Facts.
61. On 3 April 2024, GAC issued a media release titled “Traditional Owners welcome ERA’s back-flip on Ranger rehabilitation”. The media release is Annexure KK to this Statement of Agreed Facts.
62. On 19 April 2024, GAC issued a media release titled “Traditional Owners welcome NT Government support at Jabiluka”. The media release is Annexure LL to this Statement of Agreed Facts.
63. On 24 April 2024, GAC issued a media release titled “ERA plans put Jabiluka in jeopardy and Kakadu at risk”. The media release is Annexure MM to this Statement of Agreed Facts.
64. On 5 June 2024, GAC issued a media release titled “NT Government stands up for Kakadu National Park”. The media release is Annexure NN to this Statement of Agreed Facts.
65. On 19 July 2024, GAC issued a media release titled “Claims about mining Jabiluka are bogus”. The media release is Annexure OO to this Statement of Agreed Facts.
66. On 26 July 2024, GAC issued a media release titled “Jabiluka’s priceless heritage permanently protected”. The media release is Annexure PP to this Statement of Agreed Facts.
67. On 26 July 2024, the Sixth Respondent issued a media release titled “Historic decision secures permanent protection for Jabiluka”. The media release is Annexure QQ to this Statement of Agreed Facts.
68. On 27 July 2024, the Prime Minister gave a speech to the NSW Labor Conference in Sydney.
69. On 27 July 2024 the First Respondent and Minister Plibersek issued a joint media release titled “Work begins to add Jabiluka site to Kakadu National Park”. The joint media release is Annexure RR to this Statement of Agreed Facts.

Date: 4 September 2024



Leon Chung
Herbert Smith Freehills
Solicitor for the Applicant

Date: 4 September 2024



Grace Ng
AGS lawyer
for and on behalf of the Australian
Government Solicitor
Solicitor for the First and Second Respondents



Melissa Forbes
Solicitor for the Northern Territory
Solicitor for the Third and Fourth
Respondents



Principal Legal Officer, Northern Land
Council
Solicitor for the Fifth and Sixth Respondents

Schedule

Federal Court of Australia
District Registry: New South Wales
Division: General

Respondents

Second Respondent:	Commonwealth of Australia
Third Respondent:	Minister for Mining and Minister for Agribusiness and Fisheries (Northern Territory)
Fourth Respondent:	Northern Territory
Fifth Respondent:	Jabiluka Aboriginal Land Trust
Sixth Respondent:	Northern Land Council

INDEX OF ANNEXURES

ANNEXURE	DESCRIPTION	PAGE
A	Mineral Lease Agreement between Northern Land Council and Pancontinental Mining Limited and Getty Oil Development Company Limited dated 12 August 1982 (Jabiluka MLN1)	1
B	Agreement between the Applicant and the Sixth Respondent regarding Assignment of Jabiluka Project dated 24 December 1991	51
C	Deed Poll between the Applicant and Northern Land Council dated 26 May 1998	55
D	Intergovernmental Agreement between the Second Respondent and Fourth Respondent dated 17 November 2000	79
E	Jabiluka Long Term Care and Maintenance Agreement between the Applicant, the Mirarr Traditional Aboriginal Owners of Jabiluka and the Sixth Respondent dated 25 February 2005	87
F	Waiver Agreement between the Fourth Respondent and the Applicant dated 23 December 2009	116
G	Letter from the First Respondent to the Third Respondent dated 14 February 2024	124
H	Letter from the Third Respondent to the First Respondent dated 8 March 2024	126
I	General Reservation of Land on Cessation of Title (RL 33778) (Northern Territory Gazette)	128
J	Letter from the Third Respondent to the First Respondent dated 17 July 2024	131
K	Letter from the First Respondent to the Third Respondent dated 19 July 2024	134
L	Email from Anne Tan to Brad Welsh dated 13 March 2023	136
M	Australian Financial Review article containing an interview with Brad Welsh dated 10 November 2023	138
N	Letter from the First Respondent to the Applicant dated 10 May 2024	147
O	Brief of materials from the Northern Territory Department of Industry, Tourism and Trade to the Third Respondent dated 19 July 2024	149
P	Letter from the First Respondent to the Third Respondent dated 23 July 2024	177
P1	Brief of materials from the Commonwealth Department of Industry, Science and Resources to the First Respondent dated 25 July 2024	179
Q	Advice from Marie Illman and Ben Latham to the First Respondent dated 24 July 2024	254
R	Letter from the First Respondent to the Third Respondent dated 25 July 2024	256
S	Brief of Materials from the Northern Territory Department of Industry, Tourism and Trade dated 26 July 2024	258
T	Bundle of correspondence showing material received by the Third/Fourth Respondents	265
U	Letter from the Third Respondent to the Applicant dated 26 July 2024	299
V	Letter from the Third Respondent to the Sixth Respondent, the Fifth Respondent and the GAC dated 26 July 2024	300

W	Letter from the Applicant to the Third Respondent dated 26 July 2024	303
X	Letter from the Applicant to the Third Respondent dated 1 August 2024	304
Y	Letter from Anne Tan to the Third Respondent dated 2 August 2024	305
Z	Letter from the Applicant to the First Respondent dated 3 August 2024	307
AA	Media Release from GAC titled "Mirarr welcome Ranger clean up commitment from Rio Tinto" dated 9 April 2022	308
BB	Media Release from GAC titled "Jabiluka deposit will never be mined" dated 28 July 2022.	310
CC	ASX announcement by ERA titled "Independent Expert's Report Received" dated 26 September 2022	312
DD	Media release from GAC titled "Mining report flags sacred site destruction" dated 28 September 2022	529
EE	Media release from GAC titled "ERA minorities completely wrong on Jabiluka" dated 10 October 2022	530
FF	Media release from GAC titled "Rio downgrades Jabiluka, why won't ERA?" dated 26 February 2023	531
GG	Media release from GAC titled "Jabiluka's permanent protection a key test of Australia's heritage laws" dated 1 September 2023	532
HH	Media release from GAC titled "GAC corrects recent reporting by Energy Resources of Australia Ltd" dated 19 March 2024	533
II	ASX announcement by ERA titled "ERA lodges application for renewal of Jabiluka Lease" dated 20 March 2024	535
JJ	Media release from GAC titled "Empty words with a \$2 billion dollar price tag from Kakadu uranium miner" dated 21 March 2024	537
KK	Media release from GAC titled "Traditional Owners welcome ERA's back-flip on Ranger rehabilitation" dated 3 April 2024	539
LL	Media release from GAC titled "Traditional Owners welcome NT Government support at Jabiluka" dated 19 April 2024	540
MM	Media release from GAC titled "ERA plans put Jabiluka in jeopardy and Kakadu at risk" dated 24 April 2024	541
NN	Media release from GAC titled "NT Government stands up for Kakadu National Park" dated 5 June 2024	542
OO	Media release from GAC titled "Claims about mining Jabiluka are bogus" dated 19 July 2024	543
PP	Media release from GAC titled "Jabiluka's priceless heritage permanently protected" dated 26 July 2024	544
QQ	Media release from the NLC titled "Historic decision secures permanent protection for Jabiluka" dated 26 July 2024	545
RR	Joint Media Release from the First Respondent and Minister Pliibersek titled "Work begins to add Jabiluka site to Kakadu National Park" dated 27 July 2024	547