



Defence Force Remuneration Tribunal

DECISION

Defence Act 1903
s.58H—Functions and powers of Tribunal

NUCLEAR SUBMARINER WORKFORCE – TRANCHE 1 (Matter 7 of 2024)

MS B. O'NEILL, PRESIDENT

MR A. MORRIS, MEMBER

CANBERRA, 22 JULY 2024

MAJGEN G. FOGARTY AO RETD, MEMBER

[1] This decision arises from a listing application from the Australian Defence Force (ADF) for a determination to be made under Section 58H of the *Defence Act 1903* (the Act). The listing application¹ seeks to establish nuclear submariner employment categories, recruitment pathways and an interim remuneration structure to recognise those Navy personnel already undertaking nuclear submarine training.

[2] We considered the first tranche for this workforce in a hearing on 26 June 2024. Ms K Hagan appeared for the ADF and Mr K Wong for the Commonwealth. Rear Admiral M Buckley AM CSC, Head of Nuclear Submarine Capability and Captain M Hoffman RAN, Director Nuclear and Conventional Submarine Workforce Development appeared as witnesses for the ADF. We received written experiential accounts from six officers across two United States Navy (USN) training cohorts, three officers in a Royal Navy (RN) cohort; and eight sailors in a USN enlisted training cohort.

Background

[3] Since the Government announced the AUKUS partnership in September 2021, the ADF has been on a vastly accelerated path to develop a workforce management and remuneration structure to support future capability, and Navy's essential and emerging Nuclear Submarine (SSN) workforce.

[4] The AUKUS pathway requires the Navy to continue operating Collins Class Submarines (CCSM) until the early 2040s; achieve 'Sovereign Ready' in the early 2030s; the acquisition of at least three USN Virginia Class SSNs; and delivery of the first trilaterally AUKUS designed SSN platform in the late 2030s/early 2040s.² It is clear the transition will be extremely complex and pose unique strategic challenges, in particular the requirement to maintain the current CCSM capability and workforce while expanding to meet the cultural shift to SSNs.

Submissions

ADF

[5] The ADF states this application is the first in a series of four, and the initial five-year remuneration proposal for SSN matters anticipated over the next three-plus years. It submits the focus of this first tranche is to *'recognise nuclear power training and qualifications, provide a conservative salary placement and pathway for ab initio entry (slightly better than CCSM placements) and to provide a no-detriment arrangement for internal Navy and ADF transfers into the SSN workforce'*.³

[6] The ADF submits that development of the cases in tranches will reflect *'operational priorities and timings for the requirement to commence new recruiting and training pathways'* and be *'based on limited development of RAN career and training continuums for each platform, thus allowing a 'test and adjust' approach'*.⁴

[7] This Tranche 1 submission involves creating interim remuneration arrangements for the following three primary modes of entry:

- a. ab initio recruiting into the newly created workgroups;
- b. CCSM qualified members transferring to new workgroups; and
- c. ADF Service transfers into new workgroups.

[8] The proposed interim remuneration arrangements will:

- a. establish workgroups and placements within the current Graded Officer Pay Structure (GOPS) and Graded Other Ranks Pay Structure (GORPS) structures for the initial training phases, until the award of initial Nuclear Qualification (NQ); and

- b. utilise the existing Officer Aviation Pay Structure (OAPS) to create a specialist pathway for those NQ members who undertake the seagoing submariner pathway in the US or UK.

[9] Specifically, in Tranche 1, the ADF seeks to establish:

- a. employment categories of:
 - i. Nuclear Powered Submarine Officer (SSNO);
 - ii. Nuclear Technician (NT); and
 - iii. Nuclear Marine Engineer Officer Submariner (MESM-N).
- b. GOPS/GORPS interim placements in accordance with the ab initio entry career paths up to NQ;
- c. OAPS for seagoing pathway:
 - i. transition to OAPS at the next Officer Aviation (OA) increment that is equal to, or the next above, the GOPS/GORPS rate of salary payable to the member, immediately before placement into the OAPS;
 - ii. annual OA increment progression on NQ anniversary date; and
 - iii. recognition of further specified NQ with a single OA increment increase within OAPS.
- d. non-reduction principles for salary protection for CCSM and ADF transfers in recognition of the ADF priority to develop the SSN workforce.⁵

Commonwealth

[10] The Commonwealth did not oppose the ADF proposal.⁶ It recognised the use of the OAPS pay spine ‘*for select cohorts ensuring they are not disadvantaged by unforeseen outcomes of new and evolving career structures*’⁷ and realised the considerations of a test and adjust approach.⁸

[11] The Commonwealth sought ‘*further elaboration about what non-remunerative measures are being considered to address recruitment and retention for CCSM and SSN pathways*’.⁹

Witness Evidence

[12] **Rear Admiral (RADM) Buckley** gave written and oral evidence outlining the challenges of growing the RAN submarine workforce to meet CCSM, Virginia Class (SSN-V) and future AUKUS submarine (SSN-A) requirements. He stated these will include *‘attracting sufficient qualified personnel to undertake SSN training, provision of clear career continuums and transition plans, retaining qualified personnel, and developing appropriate remuneration arrangements for the new workgroups’*.¹⁰ We appreciated his detailed evidence about the AUKUS Optimal Pathway and acknowledge it is a *‘significant National undertaking, involving the Australian Submarine Agency (ASA), Department of Defence, multiple government agencies, defence industry, state governments, the university/schools and medical sector just to name some of the stakeholders’*.¹¹

[13] RADM Buckley outlined the fundamental shift to a *‘nuclear mindset developed by the ASA as a set of shared qualities and attitudes that shape the way the ASA thinks, acts and learns’*. He explained that the nuclear mindset consists of *‘ten nuclear propulsion principles and a commitment to individual and collective behaviour that underpins how we manage and oversee the safe and secure delivery of Australia’s nuclear-powered submarine program’*. He detailed how this will require detailed application in *‘recognising the special characteristics and unique hazards of nuclear Naval propulsion technology’*.¹²

[14] RADM Buckley outlined the future workforce obligation to *‘grow a workforce of around 20,000 Australians directly involved in this program across three phases’* noting *‘about 3,000 of those are going to be submariners, a significant, but by no means, the only part of the workforce we have to grow’*. We note his advice in the hearing that *‘pretty much all of that workforce needs to have higher STEM acumen’* which we appreciate is something that is in *‘high demand across other sectors’*.¹³ We realise that about 25 per cent of that 20,000 will be government workforces with the *‘greater sum of the workforce’* being the industry workforce. We accept this creates a workforce where, of the 17,000, almost half of those will be required to build the submarine with half required to sustain them and appreciate that *‘even though they are similar, they are quite distinct workforces’*.¹⁴

[15] On the topic of workforce demand, RADM Buckley spoke about competing labour markets and the increasing need to reward very highly-specialised people across Navy and equivalent civilian labour markets. We agree the industry pull is a *‘huge risk’* because it has the potential to remunerate people very attractively. We appreciate the deliberate *‘career management approach’* taken by the ASA across an industry which is, in reality, ultimately supporting Navy.¹⁵

[16] **Captain (CAPT) Hoffman** gave written and oral evidence on the current CCSM workforce where, of the 12 workgroups, five are presently assessed as *‘critical’* with a further five *‘at risk’*.¹⁶ He expanded on this, stating the Marine Technical workforce is the *‘highest CCSM workforce of concern with longstanding retention issues exacerbated by poor recruiting achievement’* with the workgroup considered either critical or at risk for the past seven years.¹⁷

[17] We note CAPT Hoffman chairs the Submarine Workforce Steering Group for which Marine Technicians are *‘a prime focus at the moment’*.¹⁸ He stated the Working Group is also looking at *‘non-financial aspects to remediate the workforce including accelerated pathways, more flexibility in training, looking at the work-life balance and influencing that where we can’*.¹⁹ Additionally he referred to *‘a lot of options and a lot of different roles that have to be filled across the submarine enterprise entirely’* providing a range of career opportunities and assisting career development.²⁰

[18] CAPT Hoffman outlined the complexities in *‘delivering the right number of suitably qualified and experienced submariners, at the right time, to support current and future submarine capability’*. He also remarked on the need for careful planning, management and flexibility to transition the workforce from the CCSM to a Collins Life-of-Type-Extension, to a SSN-V workforce and finally to a SSN-A *‘all within the space of 15 years’* and while all operating concurrently.²¹ He further explained the requirement to *‘make sure we have 100 per cent of our Sovereign Ready crew available’* using, as an example, a Senior Chief position required which must be created in eight years by the Navy in a system that normally takes – even in the proven USN system – 15 to 16 years.²²

[19] With further regard to remuneration, CAPT Hoffman explained the conservative approach taken in developing the initial pay structure. He outlined how research was undertaken to understand how other nations addressed this, and the need to ensure the structure is *‘attractive enough to recognise the training that they’re doing although we won’t fully appreciate whether we’ve hit the mark for a couple of years’*. He considers, as a result, that a *‘whole balanced structure in relation to the interfaces between the pay points’* has been created.²³

[20] Included with CAPT Hoffman’s affidavit were written experiential accounts from 17 personnel presently under training in both the USA and UK. We value, and recognise, their efforts and the challenges they face with *‘the immense pressure felt by members of our cohort to excel in light of the reputational risks inherent in this endeavour – our performance directly influenced USN perceptions of Australia’s intellectual capacity to steward naval nuclear propulsion technology’*.²⁴ We note this is coupled with *‘the severity of Australia’s undertaking and our commitment to maintaining a flawless nuclear safety reputation’*.²⁵ We realise this has been achieved in some cases despite significant teething issues due to the infancy of the program, access to facilities, training alignment and reporting requirements.²⁶

Consideration

[21] We considered this matter acknowledging, from the outset, that the workforce transition will be *‘lengthy, involving three different submarine platform types and crews, and continue out to the early 2050s’*.²⁷ We know the submarine workforce has experienced significant attraction and retention challenges over a substantial period and, in considering this matter, had reference to a number of previous matters concerning submarine remuneration that have been brought before us previously in an attempt to address these issues.

[22] We accept the evidence of RADM Buckley that *‘the tranche approach to salary cases provides the ADF flexibility in designing a contemporary remuneration structure which can be adapted as priorities change, timings for new workgroups are clarified, and training continuums are developed’*.²⁸ Further, we accept the tranches are proposing an interim approach based on the current development of career and training continuums for each platform, and recognise this will require a ‘test and adjust’ approach – a term we expect will be used frequently as each tranche is presented or returned to us for modifications.²⁹

[23] We considered the evidence presented for the establishment of the three new employment categories. We accept the USN follow a ‘Line Officer’ model requiring SSNOs to be trained in engineering as well as warfare roles and to complete nuclear power training while maintaining NQ throughout their career in order to attain Command. In contrast, we recognise there are three individual specialist workgroups performing these engineering and warfare roles in the CCSM.

[24] We accept NT is a new sailor workgroup required to operate and maintain the SSN nuclear power plant and accept that the RAN MESM-N workgroup is required because the RN require Marine Engineers to undertake nuclear power training in addition to the current RAN engineering training.

[25] We gave consideration to the submarine remuneration principles developed by Navy which provide the framework to maintain *‘a consistent and synchronised approach to all elements’*³⁰ including:

- a. work value of CCSM and SSN workgroups underpinning salary placements and outcomes;
- b. for NQ workgroups in Tranche 1, additional work value and NQ will be recognised by differentiation in pay placement;
- c. for non-nuclear trained work groups in Tranche 2, additional SSN training and skills may be recognised with differential pay, otherwise the same pay outcome with CCSM workgroups may apply (i.e. GORPS pay grades 6 to 9 with appropriate SSN skill grade and pay grade triggers identified); and
- d. SSN Command and warrant holder accountabilities, responsibilities and consequences of error may be recognised with different remuneration to CCSM Command, depending on the work value assessment outcomes.³¹

[26] In Matter 5 of 2016 – Air Force: Officer Aviation Pay Structure ³² we determined a ‘pay spine’ specific to aviation. The current OAPS figures at the time of writing are:

Level	\$ pa	\$/day	OA 18	164,870	451.70
OA 37	231,414	634.01	OA 17	160,496	439.72
OA 36	227,555	623.44	OA 16	156,124	427.74
OA 35	224,639	615.45	OA 15	151,751	415.76
OA 34	221,720	607.45	OA 14	147,378	403.78
OA 33	218,809	599.48	OA 13	143,002	391.79
OA 32	215,889	591.48	OA 12	138,631	379.81
OA 31	212,973	583.49	OA 11	134,255	367.82
OA 30	210,062	575.51	OA 10	129,884	355.85
OA 29	207,145	567.52	OA 9	125,506	343.85
OA 28	204,229	559.53	OA 8	121,134	331.87
OA 27	201,315	551.55	OA 7	116,778	319.94
OA 26	198,398	543.56	OA 6	112,405	307.96
OA 25	195,480	535.56	OA 5	108,033	295.98
OA 24	191,109	523.59	OA 4	103,660	284.00
OA 23	186,734	511.60	OA 3	99,288	272.02
OA 22	182,364	499.63	OA 2	94,917	260.05
OA 21	177,990	487.64	OA 1	90,542	248.06
OA 20	173,616	475.66	OA 0	86,171	236.08
OA 19	169,243	463.68			

[27] We note that, in the development of a suitable remuneration structure, alternative options were canvassed including:

- a. use of GOPS/GORPS only for interim continuums for all entry pathways;
- b. use of OAPS only for interim continuums and all entry pathways;
- c. use of GOPS/GORPS for ab initio and OAPS for in-Service pathways; and
- d. the proposed solution - use of a GOPS/GORPS and OAPS combination.³³

[28] The ADF submits that ‘*while it is in name the Officer Aviation Pay Structure, the OAPS system is equally applicable to any complex workforce able to demonstrate the system’s utility is supporting a defined, measureable strategy*’.³⁴ We do not necessarily share that view, and remind it that the OAPS was developed purely with an aviation structure focus. Further, at the time of determining the structure, the Tribunal commented specifically that it was not be used as a ‘*binding precedent*’ for other matters.³⁵

[29] We queried whether the ADF had considered alternative nomenclature, instead of OAPS, to terminology linked to submarine service and accept their advice that ‘*renaming the OAPS and developing the structure to include all nuclear submariner rank ranges, competency levels and salary pay points was considered too complex and not achievable within the timeframe*’. We accept that ‘*developing a structure of this nature would require a deeper level of understanding the nuclear submarine career continuums, competency points and expected times in rank*’ and agree that due to the evolving nature of the workforce, much of this information remains unknown.³⁶

[30] In Matter 2 of 2023 – Submarine Capability Assurance Payment (SM-CAP) – Eligibility Assessment³⁷ we agreed to the amendment of eligibility provisions for the allowance, thereby enabling the payment of bonuses administered by the ADF, under s.58B of the Act, without affecting eligibility for SM-CAP. At the time, it was agreed this option would ‘*only be used in exceptional circumstances and only be offered in situations of workforce criticality, which could include SSN or targeted critical CCSM workgroups*’.³⁸ We were advised of the details of two such allowances currently being offered to these workforces and accept they are:

- a. a retention bonus for nuclear qualified in-Service transfers of \$100,000 with a three-year service obligation for in-Service transfers who transfer to the SSN training pathway and achieve NQ by 30 June 2028; and
- b. a completion bonus for seagoing CCSM Marine Technician submariners of \$35,000 and \$50,000 respectively to personnel who agree to complete 12 months in one or more of identified marine technician submariner seagoing positions.³⁹

[31] We considered the requirements for non-reduction provisions for CCSM, and ADF members, who transfer to NQ workgroups and agree that providing salary protection for these members is essential to achieve training numbers and ensure members are not negatively impacted.⁴⁰

[32] The concerns of the Commonwealth regarding non-remunerative factors were addressed in the hearing. We rely on CAPT Hoffman’s evidence in this regard that it is probably too early ‘*to see too much relief in that area*’.⁴¹ Additionally, in the hearing the Commonwealth sought advice from the ADF ‘*about what mitigation strategies are contemplated should the SSN workgroups negatively impact upon an already below-healthy Collins Class workforce cohort*’. The Commonwealth subsequently acknowledged the application of s.58B bonuses ‘*in this context*’⁴² while also seeking assurance of the budget and costing of such bonuses.⁴³

[33] We queried the outcomes if the ambitious recruiting and crew targets cannot be met. We are encouraged that loss and attrition rates have been ‘*set very high*’⁴⁴ to encompass these factors. We specifically note there have been no training failures to date, with all students passing to extremely high standards which is, we agree, a ‘*pretty significant achievement*’.⁴⁵

Conclusion

[34] The scale of the AUKUS plan is momentous, with the Australian submarine force needing to ‘*more than triple by the 2050s*’,⁴⁶ in an environment where retention and recruitment issues are of concern throughout the ADF. The challenge is extraordinary in every dimension and at every level. It is, as RADM Buckley stated, ‘*a complete mindset shift*’ and an ‘*enormous lift*’ for Navy.⁴⁷

[35] We accept the workforce requirements for the SSN workforce are complex and made even more so by having to maintain the existing CCSM capability. We agree the interim approach for Tranche 1 is appropriate to encompass the first five years of the SSN ab initio career continuums and meet the needs of those existing ADF members selected to progress on the SSN pathway.

[36] We agree with the ‘test and adjust’ approach and note this will be informed by workforce trends, attraction and retention data, transfers, and loss rates, all of which will combine to provide the workforce health and identify areas likely to need further attention.

[37] We agree with the selected remuneration option and agree it *‘best achieves the criteria and utilises the well understood GOPS/GORPS structures for placements within the early training phases up to the award of NQ, followed by transition to OAPS’*.⁴⁸ We agree that, for now, use of the OAPS provides a common salary treatment for both ab initio and transfer members on the nuclear pathway, from a specified qualification point, acknowledging that the career continuum details and timings are not yet finalised and that there will be a ‘test and adjust’ period for some time. We consider a more mature remuneration model will need to be designed as more career continuums and workforce transitions are developed, and the value of the workforce is realised. We look forward to working with the ADF to develop a more comprehensive longer-term remuneration model across all pathways and platforms.

[38] We accept the s.58B bonuses are short term measures for the attraction and retention of ADF transfers to meet the requisite training demand, and achieve NQ, until recruiting can achieve training targets through ab initio entry. We agree they are the most appropriate measures at this time. We accept that members transferring from non-submarine workgroups may have eligibility for other ADF s.58B bonuses and, in these circumstances, may incur an additional Undertaking For Further Service (UFFS) to be served consecutively depending on the eligibility policies for such payments.

[39] We agree Tranche 1 will enable Navy to recognise those officers and sailors already undertaking training overseas, provide pathways for ADF transfers, and commence recruiting. We accept the workforce *‘has been, and will continue to be, engaged on changes occurring to the submarine capability, including the development of plans for achieving Sovereign Ready and Optimal Pathway milestones’*. We are encouraged that the *‘workforce will be continually monitored, and provided with information about the changes to the ADF’s submarine capabilities, remuneration matters, and individual career options’*.⁴⁹

[40] In the hearing, the Commonwealth sought assurance from the ADF about the affordability of the proposal, including the costing of s.58B bonuses. We refer to the advice that costs for this tranche are based on training demand workforce numbers and will be met through the Defence budget out to 2029/30.⁵⁰

[41] To avoid mixing the placement of nuclear submarine terminology and rules into the OAPS construct we will provide a separate section within our determination, which will reflect the SSN categories while utilising the OAPS increments. Determination 4 of 2024 will give effect to our decision from 1 August 2024.

[42] Finally, we particularly wish to thank those 17 officers and sailors who took time to provide us with very frank and detailed written statements about their experiences serving and training with the USN and UK, as well as the impact on their family and personal life. This was a significant impost on their very busy schedule. We assure them that the information provided us with a clear understanding of the private implications of higher-level decisions.

[43] We hope they are justifiably proud of their achievements thus far. The trust the Navy has placed in them, and them in it in, is profound and should not be underestimated. We firmly agree with them that this *'is not an endeavour for the faint of heart and will require the continued recruitment of Australia's brightest and determined individuals to ensure the throughput of multiple sovereign ready crews into the 2030s'*.⁵¹

MS B. O'NEILL, PRESIDENT
MR A. MORRIS, MEMBER
MAJGEN G. FOGARTY AO RETD, MEMBER

Appearances:

Ms K Hagan for the ADF assisted by Flight Lieutenant L Hawkett

Mr K Wong for the Commonwealth assisted by Mr C Johnson

Witnesses:

Rear Admiral M P Buckley AM CSC RAN, Head Nuclear Submarine Capability

Captain M D Hoffman RAN, Director Nuclear and Conventional Submarine Workforce Development

Experiential USN and RN training accounts:

Lieutenant Commander James F

Lieutenant Commander Samuel

Lieutenant Commander James H

Lieutenant Commander Adam

Lieutenant Steven

Lieutenant Stephen

Lieutenant Jason

Lieutenant William

Lieutenant Isabella

Warrant Officer Francis

Leading Seaman Ashley

Leading Seaman Jacob

Leading Seaman Trent

Leading Seaman Mathew

Able Seaman Braydon

Able Seaman Sheroy

Able Seaman Brock

Able Seaman Dale

¹ BN80616769 Listing Application – Navy: Nuclear Submariner Workforce – Tranche 1 dated 11 April 2024.

² ‘Sovereign Ready’ refers to a point at which Australia has the ability to safely own, operate, maintain and regulate a sovereign conventionally armed, nuclear powered submarine capability.

³ ADF Submission Nuclear Submariner Workforce – Tranche 1 (ADF1) dated 6 June 2024 page 12 paragraph 1.12.

⁴ ADF1 page 9 paragraph 1.4.

⁵ ADF1 pages 11 and 12 paragraph 1.11.

⁶ Commonwealth Submission Nuclear Submariner Workforce – Tranche 1 (CWLTH1) dated 26 June 2024 page 2 paragraph 5.

⁷ CWLTH1 page 16 paragraph 80.

⁸ CWLTH 1 page 15 paragraph 76.

⁹ CWLTH page 17 paragraph 91.

¹⁰ Affidavit of Rear Admiral M P Buckley AM CSC RAN (ADF2) dated 7 June 2024 page 2 paragraph 9.

¹¹ ADF2 page 8 paragraph 31.

¹² ADF2 page 11 paragraph 33.

¹³ Transcript 26 June 2024 page 39 lines 24 to 27.

¹⁴ Transcript pages 49 and 50 lines 35 to 2.

¹⁵ Transcript page 48 lines 40 to 45.

¹⁶ Affidavit of Captain M D Hoffman RAN (ADF3) dated 11 June 2024 page 3 paragraphs 11 and 12.

¹⁷ ADF3 page 4 paragraph 14.

¹⁸ Transcript page 19 line 24.

¹⁹ Transcript page 19 lines 27 to 29.

²⁰ Transcript pages 25 and 26 lines 44 to 10.

²¹ ADF3 page 4 paragraph 17.

²² Transcript page 22 and 23 lines 45 to 3.

²³ Transcript page 27 line 7.

²⁴ Naval Submarine School letter – SSN Officer Training – Cohort Two experiential account for DFRT case dated 19 April 2024 paragraph 16.

²⁵ Naval Submarine School letter – SSN Officer Training – Cohort One experiential account for DFRT case dated 4 April 2024 paragraph 28.

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- ²⁶ Australian Submarine Agency letter BN53619786 SSN Officer Training – experiential account for DFRT case – UK cohort dated 15 April 2024 paragraph 34.
- ²⁷ ADF1 page 8 paragraph 1.2.
- ²⁸ ADF2 page 2 paragraph 10.
- ²⁹ ADF1 page 9 paragraph 1.4.
- ³⁰ ADF1 page 8 paragraph 1.3.
- ³¹ ADF1 page 42 paragraph 5.3
- ³² <https://www.dfrt.gov.au/matters/air-force-officer-aviation-pay-structure>
- ³³ ADF1 pages 44 to 47 paragraphs 5.6 to 5.19.
- ³⁴ ADF1 page 15 paragraph 2.14
- ³⁵ <https://www.dfrt.gov.au/matters/submarine-capability-assurance-payment-eligibility-amendment>
- ³⁶ DMR Email to DFRT Secretariat of 12 June 2024.
- ³⁷ <https://www.dfrt.gov.au/matters/submarine-capability-assurance-payment-eligibility-amendment>
- ³⁸ DMR BN84130646 letter Royal Australian Navy – Submarine s58B Bonuses dated 20 June 2024.
- ³⁹ We note the requirement for members to repay the \$100,000 bonus in full if they do not meet the requirements of the agreed period for reasons ‘*within their control*’.
- ⁴⁰ ADF1 page 52 paragraph 6.16
- ⁴¹ Transcript page 19 line 37.
- ⁴² Transcript page 15 lines 2 to 5.
- ⁴³ Transcript page 16 lines 11 to 14.
- ⁴⁴ Transcript page 33 line 1.
- ⁴⁵ Transcript page 24 line 37.
- ⁴⁶ Transcript 26 June 2024 page 3 lines 26 and 27.
- ⁴⁷ Transcript page 41 lines 34 to 40.
- ⁴⁸ ADF1 page 47 paragraph 5.17
- ⁴⁹ Transcript page 9 lines 24 to 30.
- ⁵⁰ Transcript page 9 line 45.
- ⁵¹ Naval Submarine School letter – SSN Officer Training – Cohort One experiential account for DFRT case dated 4 April 2024.