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**From:** Amelia Hughes | 8PT Chambers [REDACTED]  
**Sent:** Wednesday, 18 March 2026 10:11 AM  
**To:** Legal  
**Cc:** Chris O'Grady; Felicity Fox; Brad Anns  
**Subject:** Royce Kupsch

Dear Mr Wheelahan KC

During the course of your opening on 10 March 2026, the Commissioner asked some questions about the role held by Royce **Kupsch** in the Union, including whether he held a paid position. Reference was made to Kupsch being the President of the State Union only (p 839 LL 5-11).

Following your discussions with Mr O'Grady KC, we provide this email to clarify the role held by Kupsch.

At the time of the appointment of the Administrator and his removal from office, Kupsch held the following positions:

- Federal Union: Divisional Branch President of the Construction and General Queensland-Northern Territory Divisional Branch, and Divisional Branch Delegate to Divisional Conference.
- State Union: State Divisional President of the Construction and General Division (**State Divisional President**).

For completeness, the office of the State Divisional President is distinct from that of the President of the State Union as a whole. Kupsch was not President of the State Union.

These positions were unpaid and honorary. Kupsch was removed from those roles upon the appointment of the Administrator pursuant to cl 3(1)(a) of Annexure A of the *Fair Work (Registered Organisations) (CFMEU Construction and General Division Administration) Determination 2024* (Cth) and cl 3(1)(a) of the *Industrial Relations Act (CFMEUQ Construction and General Division Administration) Administration Notice 2024* (Qld).

Kupsch had previously been employed in the position of 'Southeast Queensland, Health and Safety Coordinator', but resigned from that position on 16 February 2022. During the course of your opening, there was some discussion as to whether Kupsch had received a redundancy. That was not the case. He did not hold a paid position at the relevant time.

Kind regards,

**Amelia Hughes**  
Barrister  
8 Petrie Terrace Chambers  
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