Form 59
Rule 29.02(1)

Affidavit

No. of 2021

Federal Court of Australia

District Registry: New South Wales

Division: Employment and Industrial Relations

CPB Contractors and others

Applicants

Construction, Forestry, Maritime, Mining and Energy Union and others

Respondents

Affidavit of: **Lauren Mead**

Address: [redacted]

Occupation: IR Advisor

Date: 4 November 2021

Contents

Document number	Details	Paragraph	Page
1	Affidavit of Lauren Mead, affirmed on 4 November 2021	[1] – [10]	1

I, Lauren Mead of Acciona Construction, Human Resources and Industrial Relations Advisor, affirm:

1. Where the words in this statement relate to conversations in direct speech, the words identified were those words used to the best of my recollection and reflect the substance of what was said.

Filed on behalf of (name & role of party) .....

Prepared by (name of person/lawyer) .....

Law firm (if applicable) .....

Tel ..... Fax .....

Email .....

Address for service
(include state and postcode) .....

[redacted]

[redacted]

Role and Background

2. As at the 23 August 2021 I was employed as an Industrial Relations (**IR**) Advisor for Ghella. As at the 23 August 2021 I was seconded to the joint venture between CPB Contractors, BAM, Ghella and UGL (**CBGU JV**) which is undertaking the Tunnel, Stations and Development package of the Cross River Rail Project (**CRR TSD Project**).

3. As at the 23 August 2021 my role was based on the Roma Station site of the CRR TSD Project. The CRR TSD Project involves the construction of an underground railway line from Roma Street to Dutton Park with four new underground stations being constructed at Roma Street, Woolloongabba, Boggo Road and Albert Street. The Roma Station site is nearby but distinct from the Roma Tunnels work site.

4. As an IR Advisor my role with CBGU JV involved facilitating Union right of entries, advising employees and management on their industrial instruments, auditing subcontractors and conducting training in industrial relations topics on site.

5. Prior to being employed by Ghella I worked in various roles in the construction industry in human resources and IR based roles for Downer, Cleanaway and UGL. I hold a Bachelor of Commerce majoring in Human Resources from Curtin University, and a Graduate Certificate in Employment Relations from Griffith University.

Events of 23 August 2021

6. At 8.09am I received a call from Tony Moore (Supervisor). Mr Moore said to me "*Andrew Blakeley is hanging out near the stations, please come over. Bring Gary*". He was referring to Garry Lappin who is the General Superintendent.

7. Mr Lappin and I put on our personal protective equipment (**PPE**) and walked over to the entrance to the site on Roma Street. On our way we saw Mr Blakeley and a worker who I was not able to identify walking away from the stations site and down the road heading past the tunnels entry. Mr Lappin asked Blakeley '*What are you here for?*" and Blakeley replied "*Nothing*" and kept walking.

8. Mr Lappin and I continued towards the site entrance to find Mr Moore. When we arrived Mr Moore said to me "*I tried to call you to let you know that (Andrew) Blakeley has gone, but he (Andrew Blakeley) has gotten in past the traffic controllers and walked around past the crib rooms and then went outside again.*"

9. I then went and spoke to the Traffic Controller on duty. I do not recall who the Traffic Controller was. The Traffic Controller said to me "*I denied him* (Andrew Blakeley) *access, but Tony Lopez* (a leading hand from Queensland Pre-Stressing (**QPS**), *brought him* (Blakeley) *through the gate and around the cribs.*"

[redacted] [redacted]

10. Mr Moore informed me that he had observed Mr Blakeley speaking with a couple of QPS employees about a new agreement.

Affirmed by the deponent)
at 100 Melbourne Street, South Brisbane)
in Queensland)
on 4 November 2021)
Before me: [redacted])

[redacted]
Signature of deponent

Signature of witness

David Cooper