

Oaths Act 1867

Statutory Declaration

**QUEENSLAND
TO WIT**

I, **JOHN PAUL STARK**, care of [REDACTED] Toowoomba in the State of Queensland, do solemnly and sincerely declare that:

- 1 I am employed by the Wagner Group (**Wagners**).
- 2 My current position is General Manager of Australian Projects.

EMPLOYMENT HISTORY

- 3 I have been employed by Wagners since about 1993.
- 4 Between 1993 and 2001, I held various positions within Wagners, including mechanic, production manager, truck driver, quarry manager and workshop manager. These positions were based in Toowoomba.
- 5 Between 2002 and 2004, I was employed as the General Manager of Quarries, which is a division of Wagners.
- 6 In this role, I was responsible for overseeing 4 hard rock quarries and 2 sand operations. The Grantham Sandplant was one of the sand operations for which I was responsible.
- 7 Since 2004, I have held various roles in the Northern Territory and Toowoomba.

GRANTHAM SANDPLANT

- 8 In my role as the General Manager of Quarries, I reported to Denis Wagner.
- 9 I visited the Grantham Sandplant about once a fortnight to oversee the operations, provide input into any aspect of the operations and manage staff and product issues.

WESTERN SIDE OF THE GRANTHAM SANDPLANT

- 10 Attached and marked "**JPS-1**" is a copy of a plan of the Grantham Sandplant. I have highlighted various parts of JPS-1 to identify the areas and features of the site which I discuss below.
- 11 I have marked in orange on JPS-1 the area which I describe as the western embankment.

[REDACTED]
JOHN PAUL STARK

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[REDACTED]
TAKEN BY

- 12 While I was the General Manager of Quarries and to the best of my knowledge and recollection, Wagners left the western embankment as it was. No material was added to or taken away from the western embankment. There were no stockpiles of material kept on the western embankment.
- 13 I recall that there was a safety bund along the western embankment. The safety bund was near the edge of the pit. I cannot recall exactly how high the safety bund was, but it would have been at least one metre high. The bund was already there when I commenced as General Manager of Quarries.
- 14 I have coloured the approximate location of this safety bund on JPS-1 in yellow.

NORTHERN SIDE OF THE GRANTHAM SANDPLANT

- 15 There were stockpiles of topsoil kept on the northern side of the pit. I have marked the approximate location of these stockpiles in pink on JPS-1.
- 16 To the best of my recollection, these stockpiles were already there when I started working at the Grantham Sand Plant.

SOUTHERN SIDE OF THE GRANTHAM SANDPLANT

- 17 Whilst I was General Manager of Quarries, Wagners was mainly extracting sand on the southern side of the pit. There were several stockpiles of material on this side.
- 18 I have marked in blue on JPS-1 the approximate location of these stockpiles.
- 19 I cannot recall exactly how many stockpiles there were and whether or not they existed before I became the General Manager of Quarries.
- 20 There was also a small safety bund along the southern side of the pit. To the best of my knowledge, this bund would have been about one metre high.
- 21 I have coloured the approximate location of this safety bund in green on JPS-1.

SITE OFFICE AREA OF THE GRANTHAM SANDPLANT

- 22 There were stockpiles of material at the site office area. These stockpiles were comprised of sand, raw material, aggregate and road base.
- 23 I have marked the approximate location of these stockpiles in purple on JPS-1.

COMPLAINTS

- 24 I recall a few complaints made by neighbours regarding the dust and noise. I do not recall any complaints about any embankments, bunds or stockpiles.


JOHN PAUL STARK


TAKEN BY

25 And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the Oaths Act 1867.

[Redacted signature]

Declared and signed by JOHN PAUL STARK

Taken and declared before me at Toowoomba in the State of Queensland this 1st day of July 2015, before me:

[Redacted signature]

Solicitor, Queensland

JPS - 1

