

IN THE MATTER of the *Heritage Act*
1995 [the Heritage Act]

and

IN THE MATTER of Heritage Council
Appeal Hearing No. P25759 concerning
Spurling House - 38 Black Street,
Brighton (HO126).

STATEMENT OF DR CAMERON L JONES

This statement has been prepared by Dr Cameron L Jones. I am the Chief Executive Officer of Biological Health Services Pty Ltd and my professional address is Level 1, 459 Toorak Road, Toorak.

1. My academic qualifications and a summary of my experience are contained in the attached curriculum vitae which establishes my expertise to make the three reports that I have made in respect of the building at 38 Black Street, Brighton.
2. I have no private or business relationship with Dr Damien Louis or Mr Anthony Gavan, other than in the preparation of the reports that I have made concerning the building at 38 Black Street, Brighton.
3. My instructions were oral to determine the extent of mould contamination and the risk to life and health consequent upon mould in the building.
4. The facts, matters and all assumptions upon which my reports proceed are contained in the reports themselves comprising my interim findings in my advice of 9 December 2015, my report of 15 January 2016 and my response of 4 April 2017 to the report of Hutton + Ruston dated 13 January 2017 of 4 April 2017.
5. I have not been instructed to consider or take into account any documents or other materials and the literature or other material used and documents considered in making my reports are listed in the reports.
6. I made the analysis upon which I relied in making the reports.

7. The summary of my opinion is that the house has an unacceptable level of microbiological contamination in addition to visible and hidden surface contamination and airborne contamination, that it constitutes a very significant health risk, that it cannot be successfully remediated from mould, spores and mycotoxins and that the contamination was inevitable after the fire unless the building had been dried and made weatherproof within between 24 and 48 hours after the fire.
8. My reports are fully researched to the level necessary to reach the conclusions that are contained in the reports.
9. All my reports are within my expertise and those reports are neither incomplete or inaccurate.

I have made all the enquires that I believe are desirable and appropriate. No matters of significance which are regarded as relevant, to my knowledge, been withheld from the Heritage Council.

I ACKNOWLEDGE that this declaration is true and correct and I make it with the understanding and belief that a person who makes a false declaration is liable to the penalties of perjury.



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DR CAMERON L JONES

Dated: 24/05/17