

AFFIDAVIT OF (FULL NAME)

I, Steven Andrew Kilburn, of _____, affirm as follows:

1. I make this affidavit from my own personal knowledge except where expressly stated otherwise.

Personal Details

2. My date of birth is
3. I live at
4. I was employed as a Safety & Security Officer (SSO) with G4S working at the Manus Island Regional Processing Center (MIRPC) from 12 October 2013 to 21 February 2014.
5. Prior to working at Manus Island I have worked in the following.
 - a) 1980-1989 Royal Australian Navy
 - b) 1989-1995 Aviation Firefighter
 - c) 1995-2009 Queensland Fire & Rescue Service
 - d) 2009-2012 Member for Chatsworth Queensland Parliament
 - e) 2012-2013 Mines Rescue.

Arbitrary and Indefinite Detention

1. Transferee's stated to me that they were concerned about the lack of information they were receiving in relation to their application for asylum.
2. In discussions with transferee's they would often express confusion as to why they were being held in detention for so long when they were told that they had not broken any law.
3. Transferee's expressed concerns about being forced to live in PNG due to information they had learnt about PNG from the Internet.

4. I was told during my initial training that the transferee's were not criminals and had not broken the law and that they were not prisoners but simply awaiting processing.
5. Whilst I have never worked in a prison the transferee's were treated as prisoners and have very little freedom of movement or decision-making.
6. Transferee's were not allowed to talk to transferee's in other compounds for security reasons. In one instance I spoke to a transferee who's brother was placed in another compound even though it was known they were brothers after a number of complaints to The Salvation Army staff they were placed in the same compound.

Torturous, Inhuman Degrading Treatment

In my opinion I felt that the transferee's felt like prisoners and were treated like prisoners. They had limited access to recreation and education and needed to ask for anything that they wanted. In my time working at the MIRPC I witnessed a number of transferee's who's physical and mental state deteriorated significantly.

There were concerns raised by staff about the age of some transferee's. It appeared that some were under 18 and one client was later transferred into the unaccompanied minors compound until he turned 18. The conditions in the unaccompanied minors compound were very basic and lacked mental stimulation exercise and educational opportunities.

Geographic Isolation

1. Manus Island is geographically a long way from any support. It's a very remote part of PNG and one of the least developed parts of the country.
2. Some transferee's that I spoke to felt that they were being hidden away on Manus Island away from support and were scared that they would be forgotten about forced to return to their country of origin.
3. Some transferee's felt that due to their isolation there would be no support should something happen to them.

Detainee Accommodation

4. Client accommodation was substandard and breached Australian Fire Regulations. Papa block in Foxtrot compound was a fire death trap and I stated such in an Officer's report that I submitted to management after witnessing a high-risk situation.
5. There were approximately 140 people in the block with no smoke detection and escape routes that would not meet any standards. I was told it was too hard to install smoke detectors.
6. The conditions of accommodation varied from compound to compound. For all transferee's there was virtually no opportunity for privacy or any private space. Some transferee's attempted to use sheets to cover their bunks to provide some privacy, these were removed for security reasons and the safety of transferee's.
7. Some rooms were air-conditioned and others were not. Mike compound had no air-conditioning in their rooms and had one small fan on the wall. A number of transferee's slept on the floor because they said it was the coolest part of the room.
8. There was no cleaning of the rooms, and, due to security concerns, transferee's were not allowed to have cleaning equipment. Transferee's attempted to clean their rooms as best they could however some areas of accommodation were very dirty and I consider unhygienic due to the number of people in the room and the lack of proper pathways and sheltered walkways which made it difficult to keep rooms clean particularly in Foxtrot compound.

Detainee Clothing

9. Clients were not issued with hats and were required to line up in the sun for hours on end for meals etc. They also did not have regular access to sunscreen
10. There were limited washing facilities for clients to keep their limited clothing clean. Given the extreme heat and humidity in PNG the lack of cleaning facilities meant that some transferee's lived almost constantly in their pajamas. The type of washing machines provided were inadequate for the heavy workload they were subject to.

11. G4S staff were required to maintain static posts in positions with no or limited protection from the sun. The only shade structures I saw built was for the staff smoking area and a small shade structure outside Oscar mess.

Toilet Facilities

12. Toilet facilities for staff were often unclean and unhygienic. The facilities at the accommodation area known as the swamp were not sufficient and there was no isolation area for staff with Gastro who were housed in an accommodation container at the swamp.
13. Toilet facilities for clients were worse. At times I could not walk past the toilets without feeling physically sick.
14. At one point there was no water in the compound and the toilets could not be flushed for over 4 hours. Clients could not leave the compound to use any other toilets.

Medical Services

15. There's a lot of illness and sickness amongst both transferees and staff. The medical service provider IHMS struggled to keep up with the high demand for medical services from clients and staff despite the best efforts of IHMS medical staff.
16. The local hospital had very limited services and the island doesn't have the necessary infrastructure in place to deal with an influx of an extra two thousand or so people. Some locals expressed concern that transferee's were using scarce resources whilst other local guards said the MIRPC would help getting improved medical facilities on Manus Island.
17. Transferees would have to wait days for a medical appointment other than medical emergencies. Some transferees were in pain from medical conditions and particularly dental problems.
18. There was no or very limited dental facilities on the island.
19. During and after the disturbances it was difficult for transferees to access their regular medication due to fears for the safety of IHMS workers.

20. Facilities for transferees suffering mental health issues or attempting self-harm were inadequate. I spent a number of shifts working in D9, which is where transferees who were at risk of self-harm were housed. The area was terrible and caused distress to some of those placed in there. I spoke to the IHMS mental health worker who stated that the set up was appalling and was making the situation for some transferee's worse. Transferee's in D9 would stay in the same clothes for weeks. There was no facility for clothes washing.
21. In one instance a high risk client in Delta 9 that had been identified in as being at extreme risk of self harm was denied access to cigarettes in an attempt to encourage him to return to his compound. This was done without any discussion with mental health staff who stated to me that she felt this was detrimental to the transferee's mental state.

Mosquitoes – Malaria – Dengue Fever

22. Mosquito fogging took place regularly to minimise the risk of mosquito borne disease. This would occur at dusk and clients and staff could not leave the compound. When fogging took place we were forced to breath in the fumes. Fogging would occur around the mess hall whilst clients were having dinner.
23. On one occasion a transferee with asthma collapsed after breathing in the fumes. I requested to move clients with asthma out of the compound whilst fogging occurred, and I was told it was not possible until he had a medical certificate saying he needed to be moved. Some G4S expat staff would move him anyway.
24. Transferee's did not have access to mosquito repellent. Despite the fogging there was many mosquitoes in the compounds in the evening. Transferee's were very concerned about contracting Malaria.

Gastroenteritis and Tyhpoid

25. Gastroenteritis was widespread amongst staff and clients. During my time at the MIRPC I and many of my work colleagues were struck down with Gastro.
26. After a memo was issued to staff about a possible typhoid case we were told to use hand sanitiser at all times. There was no hand sanitiser available in the store.

Workplace Health and Safety (WH&S)

27. The WH&S systems at the MIRPC were almost non-existent. Breaches of Australian WH&S standards and requirements were widespread and potentially put the safety of staff and clients at risk. These issues were raised on numerous occasions by SSO's and I know many Officers' Reports were submitted regarding safety breaches; however, due to the difficulties of getting resources at Manus Island many staff felt that these issues were not being actioned quickly enough.

The Lack of Occupational Training

28. Initial training provided at the MIRPC was woefully inadequate. The training was supposed to take 6 days, but probably consisted of less than 16 hours of actual training.

29. There were no dedicated training facilities and we moved from place to place looking for rooms and areas to conduct training.

30. The training was inconsistent and often contradictory regarding what powers SSO's had and what actions they could take in relation to use of force.

31. On our third day of training I was sent to Foxtrot compound to shadow more experienced SSO's. Approximately 1 hour after being placed in Foxtrot compound as a shadow my SSO was required to leave due to staff shortages.

32. I was then left unsupervised for the remainder of the shift. I had no radio or other means of communication. Other newly arrived SSO's were placed in the same position. Training was stopped prior to the 6 days due to staff shortages and we were placed on shift. No other training was provided to me during my time at the MIRPC.

33. Lack of radios meaning SSO's could not call for assistance for their own safety or when help was required for a client. On one occasion I had a client who had attempted self harm, and none of the SSO's on duty in Foxtrot compound had a radio to call for assistance.

34. Lack of PPE and safety equipment. There was a lack of uniforms available for staff and the uniforms issued to staff were unsuitable for the extreme heat and humidity on Manus Island.

Tensions within the MIRPC.

1. PNG guards stated to me their frustration about the meals that the transferees had and the amount of wasted food. A number of guards felt that the transferees had better food than they were able to afford. The guards said that the PNG locals don't have a lot of money and they would get upset about the fact that transferees would get meat or fish two or three times a day.
2. I was on duty when a drunk local who identified himself as a member of the PNGDF assaulted a female staff member on the roadway outside the MIRPC. The person attempted to drag the female into the bush. She pulled away from the attacker who taunted G4S staff by saying "what can you do about it I am a soldier". A report was submitted and the PNG Police were informed.
3. An intoxicated PNGDF member harassed G4S staff and forced the lock down of the area around the Bibby. Mobile squad Police officers were reluctant to intervene as it was an issue for the local police.
4. A drunk local assaulted a G4S female employee after a function at the Wardroom. G4S IRT members related to the assaulted girl attacked the local and severely beat him. He was protected by other G4S staff and taken for treatment.
5. I was told by a number of transferee's that PNG locals and employees were operating a black market in the MIRPC. Transferee's would use cigarettes to purchase items that they could not obtain any other way. Some transferee's were very upset about being asked for bribes by PNG staff. Transferees' would sometimes need to pay bribes to get extra food such as fruit etc during meal times.
6. The fact that a large number of transferees were Muslim also caused friction. Whilst PNG guards would behave professionally on a day to day basis, many told me in personal conversations that they resented the Muslims and that they felt that it was offensive to their Christian religion to have them on the Island. A group of PNG staff told me that

they felt that God would punish them for letting the Muslims who worship an evil god into their country. They believed this would occur in the form of a natural disaster such as an earthquake or a tsunami. At one meeting I was told by a group of 8 PNG guards that felt the transferees would not be safe if they ever tried to settle in PNG.

7. A local guard expressed to me concerns about the environmental impacts of the MIRPC. Manus Island is not set up to deal with the large amount of rubbish such as plastic plates, cutlery and plastic water bottles. He stated that a number of locals were concerned about the damage being done to their island by the rubbish coming from the MIRPC.

Freedom of Movement within the MIRPC.

There is no freedom of movement for transferees within the MIRPC. Transferees are moved around the site by vehicle.

Freedom of Movement outside the Camp.

Transferees are taken on cultural excursions around the island however they were rarely allowed out of the vehicle and excursions were often cancelled due to lack of vehicles or drivers. Small groups of transferees were taken on running and walking training around the area outside the compound. This fitness training was conducted by the Salvation Army Recreation Team.

The Lack of Recreational Facilities

1. There were limited opportunities for the transferees to have physical exercise. Transferees in Delta compound in particular had no access to any open space. The Salvation Army provided treadmills, but because they were left in storage in PNG for so long rats had eaten through the electrical wiring. The treadmills were placed in Delta compound but never worked. The inability to get any relief from the conditions inside the compounds caused tension amongst the transferees.
2. Excursions were planned for transferees who had been well behaved. They would look forward to these trips, but they would often be cancelled without notice at the last minute due to lack of vehicles or drivers.
3. Recreation opportunities were very limited. Delta compound in particular had very limited opportunity for exercise. Other compounds had open space that could be used for soccer or volleyball or cricket for 2 hours per day. The Salvation Army had limited

recreational resources.

Lack of Education Services

4. There was a lack of facilities and resources for education. There were few dedicated areas for classes and clients would often have to sit in extremely hot areas with a limited number of chairs available particularly in Delta compound.
5. The Salvation Army instructors would try their best but the conditions were not satisfactory. Some Salvation Army staff I spoke to voiced their frustration at the lack of resources for education and recreation.

The Incidences of 16 and 17 February 2014

6. Within a week of arriving on Manus Island I had formed the opinion, and I made comments to my wife and people that I know that there is only one possible outcome on Manus Island and that is bloodshed.
7. I felt violence was inevitable because of the location of the centre, the poor conditions that transferee's and staff were required to live and work under, the tension between local PNG guards and transferee's, concerns about the MIRPC in the local community, the time being taken to process the transferee's asylum application and the decision by the Australian Government to tell the transferee's that they would never set foot on Australian soil, which took away their hope for a quick resolution to their asylum applications.

Peaceful Protest

8. For a period of time prior to the riot there had been protests happening at the facility. This started in Oscar compound, where protests were held each day at around three o'clock. The protests started off with a small number of protesters and grew in number over time. The mainly Iranian protesters had banners and signs, and they would peacefully stand in a group and call, "Freedom, freedom, freedom!".
9. Staff were told that at 2pm Sunday 16th February the leaders of the different cultural groups were taken for meetings with the Department of Immigration & Border Protection representatives and they were given answers to the questions that they had asked.

10. In conversations I had with transferees they made comments such as, “We’re being treated like idiots, they think we’re idiots. You know, we are not, we’re educated people, we have access to the Internet, we know what’s going on and they’re lying to us, and they’re treating us like idiots.” Others stated that they would never feel safe if they were forced to resettle in PNG.
11. At approximately six o’clock on Sunday the 16th February, 2014, I was at the facility and I heard over the radio a message, “Code Green Code Green, Shut the gate! Shut the gate! Shut the gate! Multiple escapes!” At this time there were a number of PNG and Expat staff arriving to prepare for night shift, which commenced at 1900.
12. A bus full of expats arrived just as the transferees rushed through the gate. The gate was open to allow food to be delivered from the kitchen. As the gate was opened for the vehicle to enter Oscar compound the transferees ran out the gate.
13. The escapees were running up the road (Pugwash) with their arms in the air, shouting “freedom, freedom, freedom.” As soon as they grabbed hold of them the transferees lay down on the ground without to much resistance.
14. Judging by the injuries suffered by the escapee’s and other protesters in Oscar compound it would appear that the force used by some of the PNG guards was excessive. One Australian guard told me that he had a transferee on the ground and he turned around just in time to see a PNG guard running towards them. The PNG guard proceeded to kick the transferee in the head.
15. A number of transferees were dragged off the fence and beaten. Transferees inside Oscar compound saw what was going on and started yelling and screaming. I never saw personally, rocks thrown at the Guards. The PNG guards responded by entering the compound to attack and fight the transferees inside the compound. There were significant injuries amongst the transferees. I personally witnessed the injuries to the transferees, and there were significant injuries, head injuries, face injuries, where they’d been kicked in the head. One transferee could hardly move as his ribs had been broken.
16. Australian guards intervened and attempted to separate the transferees and the PNG guards. The fighting in Oscar compound continued between transferees and PNG guards

- until the Australian guards separated the groups and moved the PNG guards out of the compound. A number of injured transferees were transferred to IHMS for medical attention.
17. Foxtrot compound transferees then started to protest and then became agitated. A number of Australian guards, myself included, were then sent to try and calm that protest down. There were a few rocks being thrown from within the compound, but they weren't thrown with any real intent.
 18. Later in the evening, at approx 9pm, another protest started that escalated quickly with a large amount of rocks being thrown from the compound. Protesters tried to smash the gate down at the end of Foxtrot to get into Mike compound.
 19. PNG Police were positioned outside the compound near the kitchen. Insults were being directed at the PNG police from the protesters in Foxtrot compound. PNG police were urging the protesters to come outside. The police were armed. All guards had exited the compound and retreated away from the main area where the rocks were being thrown.
 20. There were reports of PNG guards throwing rocks back at the protesters. We were told get down there and try and stop it. A number of G4S expat guards went down there to try and calm the situation. The PNG staff were visibly upset. There were a few PNG staff that who getting really upset, but others were holding them and saying, "Calm down", and keeping them back. Everyone was taking shelter behind a series of containers to avoid getting hit by the projectiles being thrown from Foxtrot compound.
 21. At around eleven o'clock protesting started again at the end of Foxtrot, and escalated quickly. The transferee's ripped down the gate and fence between Foxtrot and Mike Compound. There was a barrage of rocks and stones and other projectiles.
 22. The Incident Response Team (IRT) was sent in to take control and to hold that gate, and they did it whilst under attack from the protesters. The IRT were really belted for a while with stones and rocks and metal poles, anything people could get their hands on. They eventually pushed through and forced people back up into their rooms, into their areas, locked down the compound and stayed in there for most of the night. A shipping container was later placed across the end of Foxtrot compound to reinforce the damaged gate.

23. The IRT team is mainly PNG nationals who have been specifically trained for the role of IRT and from what I saw they did a very good and professional job that night in difficult circumstances. The Australian IRT supervisors told me that the IRT did a really good job under amazingly heavy conditions. What I personally witnessed in Foxtrot that night was the IRT doing their job well and professionally. Once they separated Foxtrot compound and isolated it, the compound was calm for the rest of the night.
24. Delta compound didn't get involved and Mike compound was also reasonably calm that night. Due to the number of injured transferees from Oscar compound there was no ability to provide the normal medication run that occurred each evening. A number of sick transferee's were unable to access their medication that night.
25. The Sunday day shift had stayed late into the night and I think went home at about three thirty or four in the morning. They were due to come back at 0700 Monday morning, so they were told to try and get some sleep. The night shift stayed on until 1000 Monday morning, and were due to return at 1900 Monday night; however, at 1700 we got a call saying, "Everyone get up to the compound now."
26. All available staff were brought to the compound because there was intelligence that rioting was going to resume.
27. The transferees told me that they'd learnt their lesson the night before, missing out on dinner, and that they were going to wait until after dinner before they started on the Monday night. During this time, all through this, nearly every expat guard was trying to negotiate with the transferees to avoid any further violence.

No Guarantee of Safety

28. G4S management was also meeting with the cultural group leaders in all of the compounds and trying to give them the same message. The message we were told to relay to the transferees was that "If we are forced to leave the compound due to concerns for our own safety, we cannot guarantee your safety or protect you from the PNG Police and locals."
29. I was speaking to the transferees in Charlie and Oscar compound begging them, saying

that I'd seen what had happened to the guys last night. I saw them, I saw their faces, I saw them sitting there with busted jaws, and we didn't want any more of that. "Don't, please don't do it, again tonight", I pleaded.

Stockpiling of Weapons by Local PNG Guards

30. There were a large number of local G4S guards and other local employee's from Spick & Span and Eurest on the roadway outside the compound because they had been removed from the compounds due to threats of violence. Some were armed with sticks and metal bars and other weapons. PNG locals had also been stockpiling weapons outside the MIRPC and during the day Australian staff had been removing as many weapons as possible.
31. The transferees had armed themselves. They had broken metal braces off the beds, tied them together with sheets and had sharpened them up on concrete; we had seen them doing that during the day. It was too dangerous for Australian guards to enter the compounds and remove the weapons. The IRT did sweeps through the compound to try and remove weapons.

Self Defence

32. One of the transferees told me that they had heard what happened in Oscar compound and he said "We are not going to attack anyone, but if someone comes over the fence to attack us this time we're going defend ourselves, we're not just going to be sit here."
33. Delta gave a guarantee that as long as no one came into Delta compound to attack them, they would not break out or leave. But they said, "If someone comes in here, we're going to defend ourselves".

The Night of the Incident 17 February 2014

34. That night the tension was just incredible. We all knew what was going to happen, and it was an incredibly anxious time for everyone because we knew that potentially there was going to be a full-on battle going on, which caused a lot of anxiety amongst transferees and staff.

35. There was fear amongst the transferees that they were going to be attacked and a lot of them would come up to the gate near where the expats were sitting and say, "I don't want to be involved in this" and sit and say to us, "Please keep us safe, please keep us safe!".
36. I had that experience myself where I had people saying to me, "Please, officer, please keep me safe." I did not believe that we could guarantee their safety if the PNG locals decided to enter the compounds.
37. I was informed that the transferees in Oscar compound were going to break down the fence and try and get to Foxtrot and to Mike compound in an attempt to link up all the compounds.

Local PNG Police and Dog Squad

38. On the Monday night there were more police available, the dog squad was bought in, and many more resources in place to deal with any protests. When the transferees in Oscar compound saw the Police dogs they got quite upset. The dog squad patrolled the perimeter to ensure people no transferee's escaped.
39. At around 2200 a number of rocks were reportedly thrown from Foxtrot compound. The Foxtrot transferees were trying to get into Mike compound. The intensity of the protest was much higher than the previous night. The noise was just unbelievable, the yelling, the constant barrage of rocks hitting metal and poles smashing into fences. Over the number of hours they continued rioting, the IRT was in place but got violently attacked and were exhausted. They were being attacked with rocks and stones and poles for a number of hours and eventually had to withdraw.
40. The gate between Foxtrot and Mike was torn down, and then the gatehouse that the guards usually stay in was torn to pieces, the fence was knocked over and then the transferees then had access from Foxtrot into Mike.
41. Almost everyone had withdrawn at this point, although there were still some Australian guards, I believe, in Mike compound.
42. There was a lot of radio talk going on, and there were a number of transferee's who didn't want to be involved; they called non-combatants. People who had put their hand

up and said, “I don’t want to have anything to do with this”, had been sent to the mess hall in Mike for their own safety, which is a big hall made from containers, and told to stay in there for their own safety, that way they couldn’t get hit by the stones or the rocks and could be protected from other transferees. When the fence was broken down and the Foxtrot rioters had access into Mike compound, there was concern for the safety of those sheltering in the mess.

Power Shut Off

43. Suddenly the power went off. It was a complete blackout in Foxtrot and Mike compound. The power is all fed off a generator and that generator had become unavailable for some reason. G4S management was very vocal over the radio about getting the power restored to ensure the safety of the transferee’s and G4S staff.
44. There were transferees roaming freely between Mike and Foxtrot compound. From messages being sent over the radio there was concern was that this group could either attack the people who had decided not to take part and were in the mess hall, or that once that group got together, they could push over the perimeter fence and leave the compound.
45. A message was given over the radio that there are non-combatants in the mess hall, that we had to withdraw the IRT and we could not guarantee their safety. The Police needed to do whatever they needed to do to ensure the safety of those people.

Shots Fired

46. The PNG police were then in charge and shortly after I heard the first shots. There were a number of what sounded like shotgun blasts and then some automatic weapon fire. A message come over the radio saying they’re firing warning shots in the air, and not to panic, because the sound of gunshots had caused panic amongst the transferees in the other compounds.
47. Straight after the gunshots started, Oscar compound, which had been calm or reasonably calm for most of the night, then erupted and transferees started running around the compound.

48. The Oscar protesters started getting very worked up. People were trying to calm them down. They pushed the fence over from Oscar and tried to make their way up towards Mike. They were saying they have an obligation to go and help their brothers who are under attack.
49. Expat guards and IRT members, with shields and helmets were placed near the barricade an expat guard told me that he said to them, "Please do not go past this barricade. If you go past here, there is nothing we can do. Don't do it!"
50. Australian guards used DCP fire extinguishers as a non-violent method of dispersing the protesters and to stop them passing the barricade between Oscar and Delta compound. After a short period the protesters went back into their compound, even though the fence was down, and didn't progress any further and stayed inside their compound for the rest of the night.

The Injured

51. When the gunshots started I was required to escort the injured transferees from Charlie compound to the oval where we were going to keep them safe. A number of transferee's needed to be carried due to the injuries they had sustained.
52. When we walked the injured transferees to the oval we had to pass through a large number of local people armed with sticks poles and other weapons, there was also a number of armed PNG police officers some of them were obviously affected by beetle nut.
53. They were shouting angrily at the transferees and accusing them of not respecting PNG. Myself and other expat staff had to negotiate the safe passage of the transferees. A number of local PNG staff were also trying to calm the crowd as we walked through.
54. There were 200 or so transferees taken to the oval for protection. A number of PNG staff also came to the oval to help protect the transferee's.
55. One transferee who had been injured passed out and needed to be transferred to the temporary medical facility, which had been set up on the jetty adjacent to the Bibby. I then proceeded to the wharf to assist with the injured transferees.

Medical Treatment

56. I saw a large number of seriously injured people including Reza Berati being treated by IHMS staff assisted by G4S and Salvation Army staff. Many of the staff providing assistance were visibly upset. There were over 40 people being treated by the IHMS staff.
57. There were approximately 20 people in Charlie compound and a number were severely injured with injuries including broken bones, eye and other facial injuries. We did not have enough facilities to deal with the injured transferees and the medical attention was very limited until extra medical staff arrived on the island.
58. I was given 2 boxes of Panadol and told to give it out as required. Transferees were moaning in agony throughout the night we had no access to clothing or basics such as soap shampoo, etc. for the transferees. Some transferees clothing was covered in blood.
59. A number of transferees with serious injuries were transferred off the island for medical attention.
60. One young injured man was so traumatized that he soiled himself. Expat staff members had to try and find something for him to wear. Injured transferees were lying on the floor on mattresses that were dirty and stained with blood. We had no bedding to provide to them and did not have any clean bedding for a number of days.
61. Transferees with facial injuries could not eat the food, however, even simple things like a straws were not available. Expat staff obtained a tin of Sustagen and fed one transferee with a teaspoon.
62. It is my view based on my experiences that Manus Island is not a suitable location for the Regional Processing Centre and that we cannot guarantee the safety of the transferee's housed in this facility.
63. I resigned my position on Friday the 21st February, 2014. I resigned from my position due to concerns for my personal safety and for moral reasons.

SWORN by the deponent at (place), on (date).

Signature of deponent.....

Name of witness.....

Address of witness.....

Capacity of witness.....

And as he witness, I certify the following matters concerning the person who made this affidavit
(the deponent)

1. I saw the face of the deponent.
2. I have confirmed the deponent's identity using the immigration identification card of the deponent.

Signature of witness.....