
Development Consent

Section 89E of the *Environmental Planning and Assessment Act 1979*

As delegate of the Minister for Planning, under delegation dated 16 February 2015, I grant consent to the development application referred to in Schedule 1, subject to the conditions in Schedule 2.

These conditions are required to:

- prevent, minimise, and/or offset adverse environmental impacts including economic and social impacts;
- set standards and performance measures for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the ongoing environmental management of the development.


Daniel Reary
Acting Executive Director
Key Sites and Industry Assessments

Sydney 12th NOVEMBER 2015

SCHEDULE 1

Application No.:	SSD 6864
Applicant:	Taronga Conservation Society Australia
Consent Authority:	Minister for Planning
Land:	Taronga Zoo, Bradleys Head Road, Mosman (Lot 22 in DP 843294)
Approved Development:	Sumatran Tiger Adventure, Taronga Zoo, including: <ul style="list-style-type: none">• demolition of existing carnivore exhibits and other existing structures, and associated road and path networks and ponds;• construction of new carnivore exhibit, including three separate mesh enclosed exhibit areas, carnivore holding dens, containment fences, animal food preparation and equipment store, keeper safe corridors, interpretive Sumatran village display, single storey entry and exit buildings, landscaping, signage, pedestrian pathways, seating areas, viewing areas, ranger outpost and office and amenities;• tree removal and transplantation; and• services and utilities relocation and augmentation.

DEFINITIONS

Advisory Notes	Advisory information relating to the consent but do not form a part of this consent
Applicant	Taronga Conservation Society Australia, or anyone else entitled to act on this consent
Application	The development application and the accompanying drawings plans and documentation described in Condition A2
BCA	Building Code of Australia
Construction	Any works, including earth and building works
Council	Mosman Council
Certification of Crown Building works	Certification under s109R of the EP&A Act
Certifying Authority	Professionals that are accredited by the Building Professionals Board to issue construction, occupation, subdivision, strata, compliance and complying development certificates under the EP&A Act, Strata Schemes (Freehold Development) Act 1973 and Strata Schemes (Leasehold Development) Act 1986 or in the case of Crown development, a person qualified to conduct a Certification of Crown Building works
Day time	The period from 7am to 6pm on Monday to Saturday, and 8am to 6pm on Sundays and Public Holidays
Department	Department of Planning and Environment, or its successors
Evening	The period from 6pm to 10pm
EIS	Environmental Impact Statement entitled ' <i>Sumatran Tiger Adventure, Taronga Zoo</i> ' and accompanying appendices, prepared by Urbis Pty Ltd dated June 2015
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
Feasible and Reasonable	Consideration of best practice taking into account the benefit of proposed measures and their technological and associated operational application in the NSW and Australian context. Feasible relates to engineering considerations and what is practical to build. Reasonable relates to the application of judgement in arriving at a decision, taking into account mitigation benefits and cost of mitigation versus benefits provided, community expectations and nature and extent of potential improvements. Where requested by the Secretary, the Proponent shall provide evidence as to how feasible and reasonable measures were considered and taken into account
Heritage Item	An item as defined under the Heritage Act 1977, and assessed as being of local, State and/or National heritage significance, and/or an Aboriginal Object or Aboriginal Place as defined under the National Parks and Wildlife Act 1974.

Minister	Minister for Planning, or nominee
Night time	The period from 10pm to 7am on Monday to Saturday, and 10pm to 8am on Sundays and Public Holidays
OEH	Office of the Environment and Heritage, or its successors
RTS	Response to Submissions package prepared by Urbis Pty Ltd dated September 2015, including <i>Response to Submissions Table, Soil and Erosion Control Plan, Updated Proposed Mitigation Measures</i> , and the <i>Addendum – Response to Submissions and Heritage Impact Statement</i> (prepared by Jean Rice dated September 2015)
RMS	Roads and Maritime Services, or its successors
Secretary	Secretary of the Department
Secretary's approval, agreement or satisfaction	A written approval from the Secretary (or delegate/nominee).
Site	Land referred to in Schedule 1

SCHEDULE 2

PART A ADMINISTRATIVE CONDITIONS

DEVELOPMENT DESCRIPTION

- A1 Except as amended by the conditions of this approval, development approval is granted only to carrying out the development as described in Schedule 1.

TERMS OF CONSENT

- A2 The Applicant shall carry out the project generally in accordance with the:
- a) State Significant Development Application SSD 6864;
 - b) Environmental Impact Statement entitled '*Sumatran Tiger Adventure, Taronga Zoo*' and accompanying appendices, prepared by Urbis Pty Ltd dated June 2015;
 - c) Response to Submissions package prepared by Urbis Pty Ltd dated September 2015, including *Response to Submissions Table, Soil and Erosion Control Plan, Updated Proposed Mitigation Measures*, and the *Addendum – Response to Submissions and Heritage Impact Statement* (prepared by Jean Rice dated September 2015);
 - d) The conditions of this consent; and
 - e) The following drawings, except for:
 - i) any modifications which are 'Exempt or Complying Development' as identified in *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* or as may be necessary for the purpose of compliance with the BCA and any Australian Standards incorporated in the BCA; and
 - ii) otherwise provided by the conditions of this consent.

Architectural Plans prepared by Lahznimmo			
Drawing No.	Revision	Name of Plan	Date
A-DA-002	02	Existing and Demolition Site Plan	09/09/2015
A-DA-003	01	Existing and Demolition Level 1 + 2	13/05/2015
A-DA-004	03	Proposed Site Plan	09/09/2015
A-DA-005	03	Proposed Roof Plan	09/09/2015
A-DA-010	02	Site Sections	09/09/2015
A-DA-011	01	Site Sections and Photomontage	13/05/2015
A-DA-020	02	Indicative Mesh Enclosure Details	09/09/2015
A-DA-100	01	BOH/Tiger Dens – Plan	13/05/2015
A-DA-101	01	BOH/Tiger Dens – Section	13/05/2015
A-DA-200	01	Entry Building	13/05/2015
A-DA-300	01	Inbound Viewing 01	13/05/2015
A-DA-301	01	Inbound Viewing Bridge	13/05/2015
A-DA-400	02	Midpoint Building – Ground Floor Plan	09/09/2015
A-DA-401	02	Midpoint Building – Roof Plan	09/09/2015
A-DA-402	02	Midpoint Building – Elevations	09/09/2015
A-DA-403	01	Midpoint Building – Sections	13/05/2015
A-DA-500	01	Outbound Viewing	13/05/2015
A-DA-600	01	Exit Building	13/05/2015

- A3 If there is any inconsistency between the plans and documentation referred to above, the most recent document shall prevail to the extent of the inconsistency. However, conditions of this approval prevail to the extent of any inconsistency. Where there is an inconsistency between approved elevations and plans, the elevations prevail.
- A4 The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:

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- a) any strategies, plans, programs, reviews , audits, reports or correspondence that are submitted in accordance with this consent; and
 - b) the implementation of any actions or measures contained in these documents.

LIMITS ON CONSENT

- A5 The development consent will lapse 5 years after the determination date unless the works authorised by this development consent have been commenced.

PRESCRIBED CONDITIONS

- A6 The Applicant shall comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.

LONG SERVICE LEVY

- A7 For work costing \$25,000 or more, a Long Service Levy shall be paid. For further information please contact the Long Service Payments Corporation on their Helpline 13 1441.

LEGAL NOTICES

- A8 Any advice or notice to the consent authority shall be served on the Secretary.

OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT

- A9 In addition to meeting the specific performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the development.

END OF SECTION

PART B PRIOR TO COMMENCEMENT OF WORKS

COMPLIANCE WITH THE BUILDING CODE OF AUSTRALIA

- B1 Plans certified in accordance with section 109R of the EP&A Act are to be submitted to the Certifying Authority prior to commencement of each stage of construction works and shall include details as required by any of the following conditions.

DEMOLITION

- B2 The demolition work shall comply with the provisions of *Australian Standard AS2601: 2001 The Demolition of Structures*. The work plans required by AS2601: 2001 shall be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance shall be submitted to the satisfaction of the Certifying Authority prior to the commencement of works.

NOTICE OF COMMENCEMENT OF WORKS

- B3 The Certifying Authority and Council shall be given written notice, at least 48 hours prior to the commencement of building works on the Site.

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

- B4 Prior to the commencement of any works on the Site, a **Construction Environmental Management Plan** (CEMP) prepared by an appropriately experienced and qualified person shall be submitted to the Certifying Authority. The CEMP shall address, but not be limited to, the following matters, where relevant:
- a) hours of work;
 - b) 24 hour contact details of site manager;
 - c) construction traffic and pedestrian management, in accordance with Condition B11;
 - d) construction noise and vibration management plan, in accordance with Condition B10;
 - e) management of dust to protect the amenity of the neighbourhood;
 - f) provisions for the proper handling, transport and disposal of any asbestos waste encountered on site (including unexpected finds), in accordance with the Asbestos Management Plan required by Condition B5;
 - g) erosion and sediment control;
 - h) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the Site;
 - i) external lighting in compliance with AS4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting; and
 - j) flora and fauna management.
- B5 Any existing filling on the site shall be assessed for the presence of asbestos materials during construction. An **Asbestos Management Plan** (including an Unexpected Finds Protocol) shall be incorporated into the CEMP. Existing plans and protocols applying to the zoo may be used if they comply with relevant policy and guidelines.

All materials requiring removal from the site shall be classified in accordance with Waste Classification Guidelines (NSW EPA, 2014). The Applicant shall ensure that demolition works are undertaken so that cross-contamination of the site does not occur.

Removal of asbestos and other hazardous building materials shall be undertaken by a suitably licensed contractor and an asbestos clearance certificate shall be provided before waste classification, disposal or site validation is undertaken.

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- B6 The CEMP shall not include works that have not been explicitly approved in the development consent. In the event of any inconsistency between the consent and the CEMP, the consent shall prevail.
- B7 The Applicant shall submit a copy of the CEMP to the Department and to the Council, prior to commencement of work.
- B8 Construction activities shall be carried out in accordance with the CEMP at all times.

EROSION AND SEDIMENT CONTROL

- B9 Soil erosion and sediment control measures shall be designed in accordance with the document *Managing Urban Stormwater–Soils & Construction Volume 1 (2004)* by Landcom. Details are to be included in the CEMP outlined in Condition B5.

CONSTRUCTION NOISE AND VIBRATION MANAGEMENT

- B10 The Applicant shall prepare and implement a **Construction Noise and Vibration Management Plan (CNVMP)** which shall address the following:
- a) be prepared by an appropriately experienced and qualified person;
 - b) be prepared in accordance with relevant EPA guidelines and in consultation with the EPA;
 - c) identify any annoying or intrusive noise generating activities;
 - d) describe the proposed noise and vibration management measures in detail, including measures identified in the Acoustic Assessment accompanying the EIS prepared by Acoustic Studio dated 21 May 2015;
 - e) include strategies that have been developed with the community, including all noise sensitive receivers where noise levels exceed the noise management levels, for managing high noise generating works;
 - f) evaluate and report on the effectiveness of the noise and vibration management measures; and
 - g) include a community consultation and complaints management system that would be implemented for the duration of the project.

The CNVMP shall be submitted to the Certifying Authority and the Secretary prior to the commencement of any works on the site. The Applicant shall ensure that the CNVMP is implemented during demolition and construction.

CONSTRUCTION TRAFFIC MANAGEMENT

- B11 Prior to the commencement of any works on the site, a Construction Traffic and Pedestrian Management Plan prepared by a suitably qualified person shall be submitted to the Certifying Authority. The Plan shall address, but not necessarily be limited to:
- a) details of demolition and construction activities and timing of these activities;
 - b) ingress and egress of vehicles to the site;
 - c) loading and unloading, including construction zones;
 - d) construction personnel parking;
 - e) measures to minimise vehicle queuing or idling on public roads;
 - f) the staging of works;
 - g) predicted construction traffic movements, types and routes; and
 - h) pedestrian and traffic management methods.

The Applicant shall submit a copy of the final Plan to Council for information.

HERITAGE – PRIOR TO COMMENCEMENT OF WORKS

B12 Prior to commencement of any works on the site, the Applicant shall prepare a **Heritage Management Plan** to ensure construction impacts on Aboriginal and non-Aboriginal heritage will be appropriately avoided, minimised and managed. The Plan shall include, but not necessarily be limited to the mitigation and protection measures included in the EIS and RtS, measures to protect retained items in and adjacent to the works area, and provisions for staff induction on the provisions of the Plan and also including:

- a) Archaeological investigation research design and methodology in accordance with relevant OEH guidelines;
- b) Retention of original material in the Carnivora pits where feasible and reasonable;
- c) An unexpected heritage finds procedure; and
- d) Provisions for archival recording of items on the Zoo's Section 170 Register that will be removed as a result of the proposal.

HERITAGE – DURING CONSTRUCTION

B13 A **Heritage Interpretation Strategy** shall be submitted to the Secretary for approval following the completion of archaeological investigation works and prior to the commencement of construction works on the site. The Plan shall be prepared by an appropriately qualified and experienced heritage consultant and shall be consistent with the recommendations of Section 5.3 of the *Taronga Zoo Sumatran Tigers Heritage Impact Statement*, prepared by Jean Rice and dated May 2015 and the *Addendum – Response to Submissions and Heritage Impact Statement* prepared by Jean Rice and dated 30 September 2015, including:

- a) Interpretation of the history of the site; and
- b) Interpretation and archival recording of the original pathway layout and Carnivora pits including indicating the line of the original path where it crosses new paths through the exhibit, and presenting information on the original layout and pits in a brochure and on the Zoo's website.

BUSHFIRE SAFETY

B14 The Applicant shall ensure all reasonable and feasible measures are implemented to ensure construction of the buildings comply with the construction requirements for BAL-12.5 as per *AS 3959-2009 Construction of buildings in bushfire-prone areas*.

OUTDOOR LIGHTING

B15 All outdoor lighting within the site shall comply with, where relevant, *AS/NZ1158.3: 1999 Pedestrian Area (Category P) Lighting* and *AS4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting*. Details demonstrating compliance with these requirements are to be submitted to the satisfaction of the Certifying Authority commencement of the relevant stage of works.

STORAGE AND HANDLING OF WASTE

B16 The building plans and specifications accompanying the relevant plans submitted to the Certifying Authority prior to the commencement of any works shall demonstrate that an appropriate area will be provided within the premises for the storage of garbage bins and recycling containers and all waste and recyclable material generated by this premises.

STORMWATER AND DRAINAGE WORKS DESIGN

B17 Final design plans of the stormwater drainage systems, prepared by a qualified practicing professional and in accordance with the requirements of Council shall be submitted to the certifier prior to commencement of any works. The hydrology and hydraulic calculations shall be based on models described in the current edition of Australian Rainfall and Runoff.

SYDNEY WATER NOTICE OF REQUIREMENTS

B18 An application shall be made to Sydney Water for a Certificate under Part 6, Division 9, section 73 of the Sydney Water Act 1994 (Compliance Certificate) prior to the commencement of any works.

END OF SECTION

PART C DURING CONSTRUCTION

HOURS OF WORK

- C1 The hours of construction, including the delivery of materials to and from the Site, shall be restricted as follows:
- a) between 7 am and 6 pm, Mondays to Fridays inclusive;
 - b) between 8 am and 1 pm, Saturdays;
 - c) no work on Sundays and public holidays; and
 - d) works may be undertaken outside these hours where:
 - i) between 7 am and 8 am Saturdays where works would be inaudible from the nearest residential receiver;
 - ii) the delivery of vehicles, plant or materials is required outside these hours by the Police or other authorities;
 - iii) it is required in an emergency to avoid the loss of life, damage to property and/or to prevent environmental harm;
 - iv) a variation is approved in advance in writing by the Director General or his nominee.

IMPLEMENTATION OF MANAGEMENT PLANS

- C2 The Applicant shall ensure that the requirements of all environmental management plans required by Part B of this consent are implemented during construction.

IMPACTS OF BELOW GROUND (SUB SURFACE) WORKS – NON-ABORIGINAL OBJECTS

- C3 If during the course of construction the Applicant becomes aware of any previously unidentified heritage object(s), all work likely to affect the object(s) shall cease immediately and the Heritage Council of New South Wales shall be notified immediately in accordance with section 146 of the *Heritage Act 1977*. Relevant works shall not recommence until written authorisation from the Heritage Council of NSW is received by the Applicant.

IMPACTS OF BELOW GROUND (SUB SURFACE) WORKS – ABORIGINAL OBJECTS

- C4 If during the course of construction the Applicant becomes aware of any previously unidentified Aboriginal object(s), all work likely to affect the object(s) shall cease immediately and the Office of Environment and Heritage informed in accordance with section 89A of the *National Parks and Wildlife Act 1974*. Relevant works shall not recommence until written authorisation from Office of Environment and Heritage is received by the Applicant.

SITE CONTAMINATION ISSUES DURING CONSTRUCTION

- C5 Should any new information come to light during demolition or construction works which has the potential to alter previous conclusions about site contamination then the Applicant must be immediately notified and works must cease. Works must not recommence on site until the consultation is made with the Department.

DISPOSAL OF SEEPAGE AND STORMWATER

- C6 Any seepage or rainwater collected on-site during construction shall be either re-used or disposed of, so as not to cause pollution. Seepage or rainwater shall not be pumped to the street stormwater system unless separate prior approval is given in writing by Council.

PROTECTION OF TREES

- C7 No street trees are to be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property.
- C8 All street trees shall be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, shall be replaced, to the satisfaction of Council.
- C9 Within and adjacent to the site, tree removal, protection of retained trees and transplanting of trees shall be conducted in accordance with the recommendations of the *Arboricultural Assessment: Sumatran Tiger Adventure* (EIS Appendix H), prepared by Sydney Arbor Trees and dated April 2015.

CONSTRUCTION NOISE MANAGEMENT

- C10 The development shall be constructed with the aim of achieving the construction noise management levels detailed in the *Interim Construction Noise Guideline* (Department of Environment and Climate Change, 2009). All feasible and reasonable noise mitigation measures shall be implemented and any activities that could exceed the construction noise management levels shall be identified and managed in accordance with the CEMP and CNVMP.
- C11 If the noise from a construction activity is substantially tonal or impulsive in nature (as described in Chapter 4 of the *NSW Industrial Noise Policy*), 5dB(A) must be added to the measured construction noise level when comparing the measured noise with the construction noise management levels.
- C12 Wherever practical, and where sensitive receivers may be affected, piling activities are completed using bored piles. If driven piles are required they must only be installed where outlined in the CEMP.

VIBRATION CRITERIA

- C13 Vibration caused by construction at any residence or structure outside the Site must be limited to:
- for structural damage vibration, German Standard DIN 4150 Part 3 Structural Vibration in Buildings. Effects on Structures;
 - for human exposure to vibration, the evaluation criteria set out in the *Environmental Noise Management Assessing Vibration: a Technical Guideline* (Department of Environment and Conservation, 2006); and
 - These limits apply unless otherwise outlined in the CEMP.

APPROVED PLANS TO BE ON-SITE

- C14 A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification shall be kept on the Site at all times and shall be readily available for perusal by any officer of the Department, Council or the CERTIFYING AUTHORITY.

SITE NOTICE

- C15 A site notice(s) shall be prominently displayed at the boundaries of the Site for the purposes of informing the public of project details including, but not limited to the details of the Builder, CERTIFYING AUTHORITY and Structural Engineer.
- C16 The notice(s) is to satisfy all but not be limited to, the following requirements:
- The notice is to be able to be read by the general public;
 - The notice is to be durable and weatherproof and is to be displayed throughout the works period;

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- c) The approved hours of work, the name of the site/project manager, the responsible managing company (if any), its address and 24 hour contact phone number for any inquiries, including construction/noise complaint are to be displayed on the site notice; and
 - d) The notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the Site is not permitted.

END OF SECTION

PART D PRIOR TO COMMENCEMENT OF USE

ROAD DAMAGE

- D1 The cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Site as a result of construction works associated with the approved development, is to be met in full by the Applicant/developer prior to the issue of any Occupation Certificate.

Note: Should the cost of damage repair work not exceed the road maintenance bond, Council will automatically call up the bond to recover the costs. Should the repair costs exceed the bond amount, a separate invoice will be issued.

WATER AUTHORITY COMPLIANCE

- D2 A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water Corporation. The Section 73 Certificate must be submitted to the CERTIFYING AUTHORITY prior to issue of the occupation certificate.

END OF SECTION

PART E POST OCCUPATION

LOADING AND UNLOADING

- E1. All loading and unloading of service vehicles in connection with the use of the premises shall be carried out wholly within the Site at all times.

UNOBSTRUCTED DRIVEWAYS AND PARKING AREAS

- E2. All driveways and parking areas shall be unobstructed at all times. Driveways and car spaces shall not be used for the manufacture, storage or display of goods, materials or any other equipment and shall be used solely for vehicular access and for the parking of vehicles associated with the use of the premises.

NOISE CONTROLS

- E3. Noise associated with the operation of any plant, machinery or other equipment on the Site, shall not exceed 5dB(A) (Leq) above the background noise level when measured at the boundary of the Site.

STORAGE OF HAZARDOUS OR TOXIC MATERIAL

- E4. Any hazardous or toxic materials must be stored in accordance with Workcover Authority requirements and all tanks, drums and containers of toxic and hazardous materials shall be stored in a bunded area. The bund walls and floors shall be constructed of impervious materials and shall be of sufficient size to contain 110% of the volume of the largest tank plus the volume displaced by any additional tanks within the bunded area.

EXTERNAL LIGHTING

- E5. External Lighting shall comply with *AS4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting*.

END OF SECTION

ADVISORY NOTES

APPEALS

AN1 The Applicant has the right to appeal to the Land and Environment Court in the manner set out in the *Environmental Planning and Assessment Act, 1979* and the *Environmental Planning and Assessment Regulation, 2000* (as amended).

OTHER APPROVALS AND PERMITS

AN2 The Applicant shall apply to the council for all necessary permits including crane permits, road opening permits, hoarding or scaffolding permits, footpath occupation permits and/or any other approvals under Section 68 (Approvals) of the *Local Government Act, 1993* or *Section 138 of the Roads Act, 1993*.

RESPONSIBILITY FOR OTHER CONSENTS / AGREEMENTS

AN3 The Applicant is solely responsible for ensuring that all additional consents and agreements are obtained from other authorities, as relevant. This includes relevant permits under relevant exhibited animals legislation.

TEMPORARY STRUCTURES

AN4 An approval under *State Environmental Planning Policy (Temporary Structures) 2007* must be obtained from the council for the erection of the temporary structures. The application must be supported by a report detailing compliance with the provisions of the Building Code of Australia.

AN5 Structural certification from an appropriately qualified practicing structural engineer must be submitted to the council with the application under *State Environmental Planning Policy (Temporary Structures) 2007* to certify the structural adequacy of the design of the temporary structures.

ASBESTOS REMOVAL

AN6 All excavation works involving the removal and disposal of asbestos must only be undertaken by contractors who hold a current WorkCover Asbestos or "Demolition Licence" and a current WorkCover "Class 2 (Restricted) Asbestos Licence and removal must be carried out in accordance with NOHSC: "Code of Practice for the Safe Removal of Asbestos"