

STATEMENT

I **MARY STUART BOYDELL**, Commissioner of the Queensland Water Commission, 53 Albert Street, Brisbane in the State of Queensland state on oath:

1. Reporting structure of Queensland Water Commission to responsible Ministers

1.1 In respect of water supply and demand management in South East Queensland ("SEQ"), the Queensland Water Commission ("QWC") reports to the Minister for Energy and Water Utilities as outlined below.

1.1.1 The current reporting structure is contained in the *Administrative Arrangements Order (No. 1) 2011* (gazetted on 21 February 2011) as amended by the *Administrative Arrangements Amendment Order (No. 1) 2011* (gazetted on 10 March 2011).

1.1.2 Administrative responsibility is conferred upon the Minister for Energy and Water Utilities with the QWC designated as the Administrative Unit in respect of the *South-East Queensland Water (Distribution and Retail) Restructuring Act 2009* (Distribution and Retail Restructuring Act) and for Chapter 2A, Part 1, Part 2 Divisions 1,2,4,5 (including section 360C to the extent that it applies to the function of water supply and demand management) and 7 (other than section 360FA) Part 3 Division 1 and 2, Part 4, Part 5A and Part 6 of the *Water Act 2000* (the Act).

1.1.3 Prior to the current arrangement the provisions of the *Administrative Arrangements Order (No. 1) 2010* (gazetted on 2 July 2010) were not materially different except that the responsible Minister was the Minister for Natural Resources, Mines and Energy and Minister for Trade.



Deponent



Solicitor

2. Reporting structure of Seqwater to Queensland Water Commission

- 2.1 Seqwater (the Queensland Bulk Water Supply Authority) does not report to the QWC regarding its operations. However, the *Water Regulation 2002* Water Supply Emergency provisions in Part 8, do require relevant service providers to submit monthly reports to the Minister and the QWC in relation to progress towards achievement of the outcomes stipulated in Schedules 10B and 10C (s87 and s88).
- 2.2 Seqwater is required under schedule 10B measure 9 to "take all necessary steps to prepare for and construct, Hinze Dam Stage 3 and prepare for associated water harvesting works" and under Measure 1 Bribie Island Groundwater project is required to "Take all necessary steps to make available capacity to substitute 5ML/day from the existing water supply system with underground water sourced from Bribie Island".
- 2.3 Accordingly, Seqwater is required to provide the QWC with monthly reports about its progress in carrying out these measures until the works are completed and accepted as complete by the Minister. These reporting requirements are expected to continue until June 2011, unless a regulation is made to end the emergency. The Department of Environment and Resource Management ("DERM") is currently conducting a review process for ending the emergency provisions that involves consideration of the need to discontinue or require the completion of measures through other legislative mechanisms.

3. My opinion as to whether the capacity of the Wivenhoe and Somerset Dams ("the Dams") is adequate for water security

- 3.1 By "water security", I refer to the desired levels of service objectives for the SEQ region set out in the Regional water security program for South East Queensland Revision 1, March 2010 made by the Minister under section 360M(1)(b) of the *Water Act 2000* (the Act).

[Redacted signature]

Deponent

[Redacted signature]

Solicitor

3.2 By "capacity of the Dams", I refer to the full supply volume of water stored for water supply purposes.

3.3 My background understanding includes:

3.3.1 Regulatory framework:

- (a) The QWC must make and give advice to the Minister about its regional water security options for SEQ (Section 360I of the Act) having regard to the matters set out in Section 360J of the Act and the Minister is required to make a regional water security program to achieve water security for the SEQ region (Section 360M of the Act);
- (b) If there is a regional water security program for the SEQ region, the QWC must make a system operating plan to facilitate the achievement of the desired levels of service objectives for the region; and
- (c) Chapter 2A, Part 6 of the Act provides for the QWC's power to restrict water supply in SEQ.

3.3.2 The SEQ Water Strategy provides a framework for QWC's planning functions in assessing and recommending options to achieve water security in SEQ.

3.3.3 SEQ water supply infrastructure comprises a system of dams, weirs, groundwater, desalination, purified recycled water, treatment plants and transport network and further works to be completed under the regional water security program.

3.3.4 Full Supply Level is determined by DERM through the Water Resource Plan ("WRP") processes and sets the maximum volume of water that can be stored for water supply purposes.

3.3.5 Water allocations provided through the WRP are a key input in determining the volume of water that can be supplied from the interconnected system as a whole. Water allocations from "the Dams" are a significant proportion of overall SEQ allocations, about 50%.

[Redacted signature]

Deponent

[Redacted signature]

Solicitor

- 3.3.6 The levels of service system yield (“LOS yield”) can be described as the volume of water that can be supplied from the SEQ water supply infrastructure (based on hydrological assessment), optimally operated, every year and still achieve the desired levels of service objectives for the region. The LOS yield is lower than the allocations licensed under the WRPs.
- 3.3.7 Whether the desired levels of service objectives for the SEQ region are achieved is a function of supply and demand over time.
- 3.3.8 A supply gap (whether caused by lack of availability, lack of yield or increasing demand) will be addressed by introducing new supply, triggering restrictions in accordance with the desired levels of service objectives or triggering some higher level of restriction or demand management response (which might result in a change to the desired levels of service objectives).
- 3.4 The question asks for my opinion as to whether the capacity of “the Dams” is adequate for water security. While the Wivenhoe-Somerset system plays a key role in surface water capacity it cannot be considered in isolation. The security of supply for SEQ is based on the conjunctive use of a total suite of sources and measures.
- 3.5 The SEQ Water Strategy outlines a bandwidth of time when new water supply may be required to maintain water security. At page 5 of the Strategy, Table A Impact of reduced consumption on the timing of the next augmentation and Figure A Water balance in normal operating mode, show that new water supply to meet growth will not be needed until after 2022 based on medium growth projections and is more likely to be after 2027.
- 4. My opinion as to whether the capacity of the Dams is adequate for flood mitigation**
- 4.1 The QWC has no regulatory or operational role in relation to flood mitigation. As such it is not within my role and I am not qualified to comment on this topic.



Deponent



Solicitor

5. The water security needs of South East Queensland up to 2050 and the ability of the Dams to meet those needs

5.1 I refer to and repeat my answer to topic 3 and provide the following additional information.

5.2 The water security needs of SEQ up to 2050, are articulated through the desired levels of service objectives adopted by the Queensland Government in the Regional water security program, Revision 1, March 2010.

5.3 The SEQ Water Strategy outlines the planning approach and assumptions directed to facilitating the achievement of the desired levels of service objectives through preparedness to respond to changing circumstances. The Strategy outlines a bandwidth of time when new water supply may be required to maintain water security. At page 5 of the Strategy, Table A Impact of reduced consumption on the timing of the next augmentation and Figure A Water balance in normal operating mode, show that new water supply to meet growth will not be needed until after 2022 based on medium growth projections and is more likely to be after 2027.

5.4 As outlined in the Water Supply Emergency Projects Monthly Progress Reports February 2011, Figure 2 Forecast Key SEQ Water Grid Storage levels based on probabilities of exceedance, the combined capacity of the grid 12 storages would not reach 40% until late 2013. This analysis is based on the volume of water in storage in Wivenhoe Dam having been drawn down to 77.5% at the end of February 2011 and an extremely conservative scenario of repeated worst-case twelve-month inflows. The rate of decline of water in storage eases at around 40% showing the effect of the introduction of manufactured water.

6. How the Full Supply Level was originally determined when Wivenhoe Dam was built and the reasons for any significant amendments to the Full Supply Level since that time

6.1 The QWC was established in 2006. To my knowledge there have been no amendments to the Full Supply Level since 2006. I have no knowledge of how the Full Supply Level for Wivenhoe Dam was originally determined or any knowledge of significant amendments to the Full Supply Level.


Deponent


Solicitor

7. My role in relation to the Full Supply Level of the Dams;

and

8. My role in any amendment to the Full Supply Level of the Dams

7.1 The QWC has no direct role in setting or amending the Full Supply Level of the Dams.

7.2 However, while the QWC plays no part in determining dam operating levels, the QWC's role necessitates that it consider the potential implications of such matters. Any proposal to modify the volume of water stored in a dam for supply purposes must be assessed against the water security risk criteria, and consideration given to the risk implications for the SEQ region's water security. Existing Full Supply Level for a dam is a fundamental input into any analysis of desired levels of service objectives, water supply security and base case costs.

7.3 As part of the WRP and Resource Operation Plan ("ROP") processes set out in the Act, the QWC may make a submission to DERM presenting views on the water supply capacity or operation of a dam. DERM takes all submissions into consideration in coming to a decision. To date, the QWC has made no submissions on the Full Supply Level of any dam. If any such submissions were made, they would highlight the potential impact on the achievement of the desired levels of service objectives for the region and consequences of that impact. This information would also be provided to government to assist in analysis of the costs and benefits of any proposals to alter the Full Supply Level of the Dams.

The QWC may investigate opportunities to increase the availability or reliability of water from water storages. Such investigations would include consultation with other responsible agencies and stakeholders, for example to ensure appropriate consideration of flood mitigation issues. If a viable option emerges, a submission could be made through the WRP process where the information from the QWC-led investigation could be provided. One such project identified for investigation is

Deponent

Solicitor

an assessment of the capacity of the Brisbane River system including the Full Supply Level of Wivenhoe Dam (discussed at 11.22 to 11.29).

7.4 Since the January 2011 flood event the QWC has provided assistance to Seqwater by preparing a draft report on the Impacts on SEQ Water Strategy of Various Operating Scenarios for Wivenhoe Dam 14 February 2011 (discussed at 11.18).

9. My role in relation to the dam operations at Wivenhoe, Somerset and North Pine Dams

9.1 Neither I, nor the QWC, have any regulatory or operational role in respect of dam operations at Wivenhoe, Somerset or North Pine Dams.

10. When, how and why the Full Supply Levels for the Dams, which existed at the time of the January 2011 Flood Event, was determined

10.1 I refer to and repeat my answer to topic 6 addressed earlier.

11. An account of all discussions, correspondence, meetings or briefings from 1 September 2010 to 31 March 2011 in which I was involved regarding potential changes to the Full Supply Levels of the Dams;

and

12. Provision of all notes made of all discussions and meetings regarding potential changes to the Full Supply Levels of the Dams between September 2010 and March 2011

Work arising out of Minister's request of 20 January 2011

11.1 On 20 January 2011, at 7.21pm, I received (by email from Tim Watts, Policy Advisor, Office of the Minister for Natural Resources, Mines and Energy and Minister for Trade) a letter from Minister Robertson attaching a copy of a letter from the Minister to Phil Hennessey (Chairman of Seqwater)

Deponent

Solicitor

also dated 20 January 2011 requesting the provision of all necessary assistance by QWC to Seqwater to ensure that the requests outlined in the letter to Seqwater could be responded to as a matter of priority and with urgency. A copy is attached as **Exhibit 1**.

11.2 I responded briefly to the Minister's policy advisor on 20 January 2011. A copy of that email is attached as **Exhibit 2**.

11.3 Mid-morning on 21 January 2011 I called Bob Reilly, the General Manager of the Office of the Water Supply Regulator ("OWSR"), to discuss in broad terms the content of the letters from the Minister and the next steps required for QWC to support Seqwater as requested. Bob Reilly told me that the Minister had written to the SEQ Water Grid Manager ("SEQWGM") in October 2010 requesting advice on the Full Supply Level for the coming wet season. Bob said that he had not been aware of the Minister's request when it was initiated. I advised Bob that I had no knowledge of that request, however, I was aware that on 24 December 2010 the SEQWGM had requested QWC's comment on the possibility of a small release.

11.4 Mid-morning on 21 January 2011 I called Phil Hennessey, the Chairman of Seqwater, to affirm QWC's readiness to support Seqwater as requested by the Minister. I indicated that QWC staff could provide input and if required, comment on security impacts of any scenario modeling and provide other support. I said that we would welcome attending meetings convened by Seqwater that brought all parties together to work on this. I advised Phil that I had only just learned of the Minister's October 2010 request. Phil told me that the Minister had spoken with him a couple of days earlier and that through that conversation he had become aware of the Minister's letter to the SEQ WGM in October 2010 seeking advice on releases.

11.5 At 11.30 am on 21 January 2011 I attended a meeting with Bob Reilly and staff of QWC to discuss broadly the background to and the work that might be required to support Seqwater. It was agreed at the meeting that QWC's role should be to understand and provide advice on the impact on SEQ water supply security of a possible temporary release of water from Wivenhoe Dam and/or a longer

[REDACTED]

Deponent

[REDACTED]

Solicitor

term arrangement of lowering the Full Supply Level of Wivenhoe Dam or other dams. The work to be undertaken was titled the "SOP Project". A copy of my records of and from that meeting is attached as **Exhibit 3**.

11.6 On 24 January 2011 an internal QWC meeting was held to further discuss the framework for consideration of information material to support Seqwater and to have in preparation for a meeting on 25 January 2011 involving DERM, OWSR, SEQWGM, QWC and Seqwater.

11.7 At around 7pm on 24 January 2011 I spoke to John Bradley, the Director General of DERM, regarding the letter from Minister Robertson of 20 January 2011. I advised John that QWC was in touch with Seqwater and would provide the support requested. I also advised John that I had only just learned of the Minister's October 2010 request and previously had been unaware of that request.

11.8 I responded to the Minister's letter of 20 January 2011 by letter dated 25 January 2011. A copy of that letter is attached as **Exhibit 4**.

11.9 At 10am on 25 January 2011 I attended an internal meeting of QWC staff to review the progress of the SOP project. Copies of the documents from that meeting are attached as **Exhibit 5**.

11.10 At 1.30pm on 25 January 2011 I, along with Karen Waldman (CEO, QWC), attended a meeting at DERM to discuss the Minister's letter of 20 January 2011. In attendance were John Bradley, Debbie Best, Greg Claydon and Penny Douglas from DERM; Phil Hennessey and Peter Borrows from Seqwater; Barry Dennien and Gordon Jardine from the SEQWGM. Seqwater representatives outlined their approach to responding to the Minister's letter. QWC representatives tabled the Example Framework for Consideration of the Impact on SEQ Water Strategy of Various Operating Levels for Wivenhoe Dam which is attached as **Exhibit 6**

[Redacted signature]

Deponent

[Redacted signature]

Solicitor

11.11 At 11am on 1 February 2011 I attended an internal meeting of QWC staff to review the progress of the SOP project. Copies of documents from that meeting are attached as **Exhibit 7**

11.12 At 4pm on 1 February 2011 I, along with Karen Waldman, attended a meeting at Seqwater regarding Seqwater's response to the Minister's letter of 20 January 2011. In attendance were John Bradley (by phone), Peter Allen, Debbie Best, Greg Claydon and Penny Douglas from DERM; Phil Hennessey, Peter Borrows and Jim Pruss from Seqwater; Barry Dennien and Gordon Jardine from SEQWGM. The Seqwater representatives outlined the scenarios being tested; identified questions that needed to be resolved; and advised that Seqwater would not provide further advice until it had been peer reviewed and cleared by their insurer. It was noted that DERM was to resolve ROP/Resource Operations Licence ("ROL") issues, if any. A copy of my records of and from that meeting is attached as **Exhibit 8**.

11.13 On 3 February 2011, Karen Waldman and I met with Minister Robertson for our quarterly meeting. Prior to the commencement of the quarterly meeting I met privately with Minister Robertson (the usual practice) and advised that:

- (a) QWC was undertaking work to support Seqwater as requested by the Minister on 20 January 2011;
- (b) On 24 December 2010 QWC officers responded to an urgent enquiry from the SEQWGM in relation to the potential drawdown of Wivenhoe and North Pine Dams;
- (c) I only became aware of the Minister's October 2010 letter to the SEQWGM on 21 January 2011; and
- (d) QWC had offered its assistance to other entities during and after the January flood event but only limited resources of QWC had been accessed.

Matters discussed during the formal quarterly meeting attended by the Minister, Tim Watts, Karen Waldman included:

Deponent

Solicitor

- (a) The status of work on investigations around the Wivenhoe Dam Full Supply Level that had been initiated to progress the activity identified in the SEQ Water Strategy (refer to 11.22 to 11.29); and
- (b) The possibility that some scheduled investigation works might be delayed due to disruption from the floods and some would be informed by the Commission of Inquiry.

A copy of my records of and from that meeting is attached as **Exhibit 9**.

11.14 On 3 and 4 February 2011 there were internal meetings held of QWC staff to review the progress of the SOP project.

11.15 At 12pm on 4 February 2011 I, along with Karen Waldman, attended a meeting at DERM regarding Seqwater's response to the Minister's letter of 20 January 2011. In attendance were John Bradley and officers from DERM; Phil Hennessey, Peter Borrows, and Jim Pruss from Seqwater; Barry Dennien from the SEQWGM. Seqwater outlined the broad dimensions of the scenarios being tested and the work undertaken to date and tabled a letter to Minister Robertson dated 4 February 2011. A copy of my records of and from that meeting is attached as Exhibit 10.

11.16 On 8 and 9 February 2011 there were internal meetings of QWC staff to review the progress of the SOP project. A copy of my records from the meeting on 9 February 2011 is attached as **Exhibit 11**.

11.17 On or around 9 February 2011 I was provided with a copy of a letter from Barry Dennien to Peter Borrows expressing that the SEQWGM had no objection to drawing down Wivenhoe Dam to 75% of the Full Supply Level. I was copied into internal QWC emails on the issue on that date. A copy of that correspondence is attached as **Exhibit 12**.

11.18 On 14 February 2011 the QWC produced a draft report entitled *Impacts on SEQ Water Strategy of Various Operating Scenarios for Wivenhoe Dam*, version 6, the purpose of which is to provide information on the potential impact on water supply security in SEQ if a significant volume of water is

Deponent

Solicitor

released from the water supply capacity of Wivenhoe Dam as a potential flood mitigation measure. The draft report was circulated for comment to Peter Borrows, Seqwater; John Bradley Director General DERM and Barry Dennien SEQ WGM. On 12 February 2011, Karen Waldman had informally provided the draft report to Peter Borrows.

A copy of the letters to Messrs Borrows, Bradley and Dennien and the report is attached as **Exhibit 13** (I note that there is a typographical error in the report on page 16. The "Total Central" should read 1,798,627 and not 7,798,627).

11.19 On the day prior to that, 13 February 2011, Minister Robertson issued a media release to the effect that Seqwater intended to reduce the Wivenhoe Dam level for the remainder of the 2010/2011 wet season to 75%. I had no role or input into the media release. On 14 February 2011, the Executive Support Officer of the QWC provided a copy of the media release to me. A copy of that email is attached as **Exhibit 14**.

11.20 On 3 March 2011 Karen Waldman received an email from Barry Dennien referring to QWC's letter to Seqwater dated 14 February 2011 and advising that the SEQWGM did not disagree with the summary of findings. A copy of that email is attached as **Exhibit 15**.

11.21 On 4 March 2011 there was an internal meeting of QWC staff to review the progress of the SOP project.

Optimisation Of The Yield For The Brisbane River System ("Review the operation of the Brisbane River system to optimise the water supply yield and balance flood storage and water supply storage volumes" (Activity no. 50) in the SEQ Water Strategy)

11.22 Since March 2010 the QWC has carried out work for a pre-feasibility study, as part of its role in relation to ensuring water security in SEQ, into the possibility of raising the Full Supply Level of the Wivenhoe Dam. That project is being carried out in conjunction with Seqwater, DERM and the

Deponent

Solicitor

SEQWGM and in consultation with the Brisbane City and Ipswich City Councils. Between 1 September 2010 and 31 March 2011 I was involved in discussions, correspondence, meetings and briefings in relation to this study as follows.

- 11.23 On 7 October 2010 a QWC Commission Meeting was held at 53 Albert Street at which I was in attendance. The items discussed included an update as to actions arising from earlier meetings. Attached as **Exhibit 16** is an extract of the QWC Commission Meeting Actions as at 24 September 2010 dealing with the Optimisation of the Yield for the Brisbane River System.
- 11.24 On or around 11 October 2010 I received a copy of a Ministerial Briefing Note provided by Karen Waldman to Minister Robertson on the issue of progress of the Wivenhoe Dam Full Supply Level review. Attached as **Exhibit 17** is a copy of that Ministerial Briefing Note.
- 11.25 On 4 November 2010 QWC Commission Meeting was held at 53 Albert Street at which I was in attendance. The items discussed on that day included:
- (a) an update as to actions arising from earlier meetings. Attached as **Exhibit 18** is an extract of the QWC Commission Meeting Actions as at 19 October 2010 dealing with the Optimisation of the Yield for the Brisbane River System;
 - (b) an update on infrastructure projects in which the QWC was involved in at November 2010. Projects discussed included Optimisation of the Yield of the Brisbane River system. Attached as **Exhibit 19** are copies of the Briefing Paper for Agenda Item 7 for the Commission Meeting, attachments 2 and 5 to the Briefing Paper, and the Commission Meeting Minutes that reflect the matters discussed at the meeting.
- 11.26 On 11 November 2010, Karen Waldman and I met with Minister Robertson for our quarterly meeting. Attached as **Exhibit 20** is a copy of the Ministerial Meeting Briefing Note for the meeting and attachment 1 to it.

[REDACTED]

Deponent

[REDACTED]

Solicitor

- 11.27 On 3 February 2011, Karen Waldman and I met with Minister Robertson for our quarterly meeting. Refer topic 11.13 above. (A copy of my records of and from that meeting is attached as **Exhibit 8**.)
- 11.28 On 16 February 2011 I received from the Acting General Manager of Regional Planning and Policy of QWC, Tad Bagdon, a copy of the agenda for the Brisbane System Project Reference Group (PRG). A copy of that correspondence is attached as **Exhibit 21**.
- 11.29 On 17 February 2011 a QWC Commission Meeting was held at 53 Albert Street at which I was in attendance. The items discussed on that day included an update on infrastructure projects in which the QWC was involved in January 2011. Projects discussed included Optimisation of the Yield of the Brisbane River system. Attached as **Exhibit 22** are copies of the Briefing Paper for Agenda Item 7 for the meeting, attachment 3 to the Briefing Paper and the Commission Meeting Minutes that reflect the matters discussed at the meeting. The Decision Register maintained by the QWC records that, at this meeting, a decision was made that the CEO would clarify QWC's official position regarding the project to ensure stakeholders are fully informed. A copy of the relevant extract of the Decision Register is attached with **Exhibit 22**. Attached as **Exhibit 23** are copies of emails sent confirming the Commission's official position.

13. My opinion as to what the Full Supply Levels of the Dams should be

- 13.1 The issue of what the Full Supply Levels of the Dams should be is not within the function or authority of the QWC or my role. I have discussed this earlier in my statement in response to topics 7 and 8.

[Redacted signature]

Deponent

[Redacted signature]

Solicitor

14. How (in terms of regulatory or legislative changes, directives to operators etc) and why the amount of water in the dams was decreased in February 2011

14.1 The QWC does not have any regulatory or operational role in dam safety or flood mitigation nor any role in the preparation or implementation of the Manual of Operating Procedures for Flood Mitigation at Wivenhoe and Somerset Dams. I have no knowledge of how (in terms of regulatory or legislative changes, directives to operators etc) or why the amount of the water in the dams was decreased in February 2011 other than as outlined in my response to topics 11 and 12 above. I was not involved in, or a party to, the making of that decision.

15. Details, including verbatim accounts were possible, of all discussions, correspondence, meetings or briefings regarding decreasing the Dams level in January and February 2011

15.1 I refer to my response to topics 11 and 12 above.

16. Details, including verbatim accounts where possible, of any discussions, correspondence, meetings or briefings regarding releasing water from the Dams to decrease their level in December 2010 or January 2011 (but without altering the Full Supply Level)

16.1 On 24 December 2010 Karen Waldman advised me by phone that the QWC had responded to an urgent request from the SEQ WGM. to comment on the proposed drawdown of water from Wivenhoe and North Pine Dams to lower the operating levels to 95% and 97.5% respectively and that the QWC had responded that the QWC had no objection, noting that it was an internal operating matter for Seqwater within the context of the ROP and recommending Seqwater liaise with DERM regarding conditions that might apply, particularly dam safety. No further verbal or written information was provided to me at that time.

Deponent

Solicitor

- 16.2 I was provided with a copy of the emails and background (relating to the matter outlined at 16.1 above) on 24 January 2011 following receipt of a letter from the Minister dated 20 January 2011. Copies of that correspondence are attached as **Exhibit 24**.
- 16.3 In preparing the QWC's submission to the Flood Commission further emails were identified that showed that Karen Waldman had received a copy of a letter from Minister Robertson to the SEQ WGM dated 25 October 2010 for her information and that the email was provided to other QWC officers. A copy of that correspondence is attached as **Exhibit 25**. I am advised that:
- (a) There was no request from the SEQWGM to provide comment on this letter. There was an urgent request made on 24 December 2010 as outlined at topic 16.1; and
 - (b) QWC officers consulted do not have any recollection of further consideration with SEQWGM or Seqwater officers.
- 16.4 I otherwise refer to my response to topics 11 and 12 above.
17. **An account of all briefings prepared for the Minister in the time period from 1 January 2010 until 25 March 2011 with responsibility for dam operations by the Queensland Water Commission in relation to the Dams**
- 17.1 A number of briefings were prepared by the QWC for the Minister with responsibility for dam operations between 1 January 2010 and 25 March 2011. Some have previously been provided to the Commission. None of the briefings address the issue of dam operations.



Deponent



Solicitor

18. **An account of all communications I had or any briefings received from the Flood Operations Centre (operated by Sunwater) between 1 and 19 January 2011 (and provision of all emails, text messages and notes of phone conversations)**

18.1 I was not involved in any communications with and did not receive any briefings from the Flood Operations Centre.

19. **An account of all communications within my knowledge, between any officer of the Queensland Water Commission and the Flood Operations Centre (operated by Sunwater) between 1 and 19 January 2011 (and provision of all emails, text messages, and notes of phone conversations)**

19.1 To my knowledge no officer of the QWC was involved in any communications with the Flood Operations Centre between 1 and 19 January 2011 orally or in writing. The QWC has no regulatory or operational role in the management of flood events.

All the facts and circumstances above deposed to are within my own knowledge save such as are deposed to from information only and the means of my knowledge and sources of information appear on the face of this my affidavit.

Sworn by MARY STUART BOYDELL on

4 April 2011

at Brisbane in the presence of:

[Redacted signature]

Deponent

[Redacted signature]

Solicitor