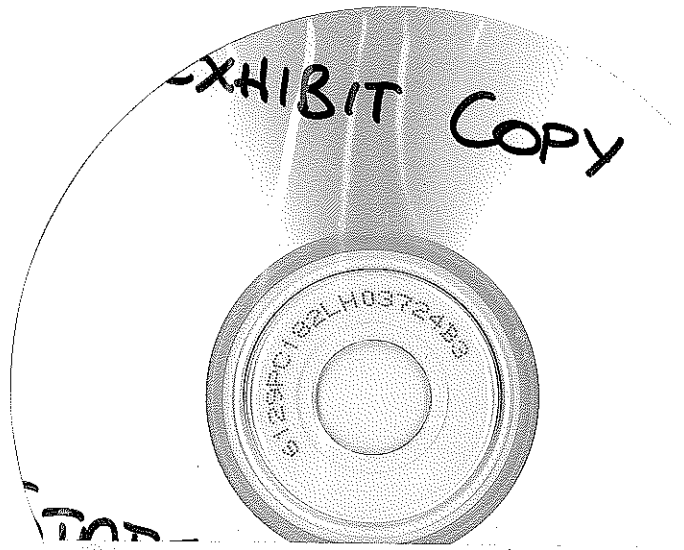


CASWELL



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Date: 19/05/11

Exhibit Number: 437

Statement of Evan Ross Caswell

I, **Evan Ross Caswell**, Civil Engineer, c/- Brisbane City Council, 266 George St, Brisbane, in the State of Queensland, state on oath as follows:

1. I hold a Bachelor of Engineering (Honours) from Queensland University of Technology. I am a qualified civil engineer specialising in flood modelling and flood investigations.
2. My current role in Council is Team Leader for the Flood Management unit of City Design. I have held this position from around April 2009. I first commenced employment with Council on 10 January 1983 as a Cadet in the Works Department. Subsequently, I was a construction engineer for a short time, and was later a hydraulics engineer before progressing to a supervisory role followed by my current team leader role within the Flood Management Section.
3. Attachment "**ERC-1**" is a copy of a notice from the Commissioner of the Queensland Floods Commission of Inquiry (**Commission**) dated 25 March 2011 requiring me to provide a statement to the Commission (**Notice**).
4. The Commission has advised that the Notice will be taken to have been complied with if, by Friday 22 April 2011, I provide a written statement under oath or affirmation in relation to the following:
 - (a) a summary of my communications with the Flood Operations Centre (**FOC**) between 1 October 2010 and 6 January 2011; and
 - (b) an account of my communications with the FOC, verbatim where possible, and annexing copies of relevant documents, between 6 January 2011 and 19 January 2011.
5. The Commission has identified the following individuals and a generic email address as comprising the FOC between 1 October 2010 and 19 January 2011 - Rob Ayre, John Ruffini, John Tibaldi, Terry Malone, Mark Tan, Neville Ablitt, Lou van Blerk, Albert Navruk; Kim Hang; Bill Stephens, John West, David Pokarier, Ken Price and [REDACTED]
6. For the purposes of preparing this statement, I have:
 - (a) extracted and reviewed the emails from my Brisbane City Council (**Council**) email account to and from the FOC during the relevant period;

[REDACTED]
Evan Ross Caswell

[REDACTED]
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- (b) reviewed emails from Council's Flood Information Centre (**FIC**) general email accounts to and from the FOC during the relevant period;
- (c) reviewed a copy of the "Brisbane Infrastructure Integrated Management System - Flood Information Centre - FIC Operations Log Sheet" (**FIC Log**). Attachment "**ERC-2**" is a copy of the FIC Log; and
- (d) reviewed a copy of the FOC "Event Log" (a redacted version of which appears as Appendix M to the report dated 2 March 2011, prepared by the Queensland Bulk Water Supply Authority trading as Seqwater (**Seqwater**) and titled "*January 2011 Flood Event - Report on the operation of Somerset Dam and Wivenhoe Dam*"). This statement refers to the un-redacted version of the FOC "Event Log" which was provided by the Commission (**Seqwater Log**). Attachment "**ERC-3**" is a copy of the un-redacted FOC Log.

7. The information set out below represents my best recollection of events sourced from my own knowledge and with the benefit of having reviewed the documents attached to this statement.

Flood Information Centre and Flood Operations Centre

- 8. I am aware that the FOC, when activated, is made up of engineers from Seqwater, Sunwater and the Department of Environment and Resource Management and manages the release of water from the Wivenhoe or Somerset Dams during a flood event.
- 9. Council's FIC is stood up where there is a possibility of a Brisbane River flood event. FIC members are mostly Council officers from the Flood Management team, the Water Management team and the Survey section. I have been a FIC Controller for approximately eleven years.

Communications with the FOC

- 10. Attachment "**ERC-4**" is a copy of a chronological bundle of documents (separated by dated tabs) comprising:
 - (a) records of my communications with members of the FOC; and
 - (b) other documents relevant to my communications with the FOC,during the period 1 October 2010 and 19 January 2011 (the **Bundle**).


Evan Ross Caswell

11. The majority of the emails that were sent or copied to me from the FOC were situation reports and reports on the actual and projected releases from Wivenhoe dam. Unless specified below, I do not have any specific comments on (or repeat the content of) the documents set out in the Bundle.

1 October 2010 to 21 December 2010

12. I recall that the communications procedures between the three key agencies, Seqwater, the Bureau of Meteorology (BoM) and Council, had been considered during a previous wet season whilst we considered the operation of the FIC. Following a minor flood event in early October 2010, Seqwater, BoM and Council decided to meet to discuss their technical capabilities, operating procedures and communication protocols between the three agencies.

13. I also recall going to some of the meetings that Council had with various government agencies in relation to the development of the draft "Protocol for the Communication of Flooding information for the Brisbane River Catchment- including floodwater releases from Wivenhoe and Somerset dams" (the **Protocol**). However, the meetings between Council, Seqwater and BoM primarily looked at technical aspects and were not directly related to the development of the Protocol.

14. On 18, 19 and 20 October 2010, I received emails from James Charalambous of Council setting the agenda for a technical capability meeting between Seqwater, BoM and Council to be held on 22 October 2010. Copies of James Charalambous' emails appear at **BCC.024.0024**, **BCC.024.0033** and **BCC.024.0039** of the Bundle.

15. Attachment "ERC-5" is a copy of my handwritten notes made during the 22 and 29 October 2010 meetings.

16. I recall that the 22 October meeting was held on the second floor of Council's office at the Greensquare Building. To the best of my recollection, the meeting on 22 October 2010 was attended by:

- (a) Don Carroll, Ken Morris, James Charalambous and myself of Council;
- (b) Peter Baddiley, Paul Birch and Jeff Perkins of BoM; and
- (c) Terry Malone and John Tibaldi of Seqwater.

17. I cannot recall if Rob Ayre of Sunwater, Jimmy Stewart of BoM and Rob Drury of Seqwater attended this meeting. I recall Chris Lavin of Council being there for part of the meeting.

18. As set out in my notes, at the 22 October 2010 meeting, each agency presented in relation to its technical capabilities. In particular, I recall discussion in relation to communication procedures between the agencies. Seqwater identified that at any time they are opening gates at the dams, they initially contact the duty officer at Council's Disaster Management who would then contact the FIC.
19. I also recall discussion at the 22 October 2010 meeting in relation to the triggers for provision of information between the agencies and to the public. I recall that Council noted that it was interested in even fairly low levels of flooding as that type of flooding influences the ferries and it also influences bridges further up the river which, although not strictly speaking Council responsibility, impact on access routes through Council areas.
20. Following on from the 22 October meeting:
- (a) James Charalambous circulated an email on 22 October 2010 attaching his notes from the 22 October 2010 meeting. A copy of James' email appears at **BCC.022.0055** of the Bundle; and
 - (b) Terry Malone circulated an email on 25 October 2010 to be discussed at the next meeting to be held on 29 October 2010. A copy of Terry's email appears at **BCC.022.0064** of the Bundle.
21. The Agenda for the 29 October 2010 meeting is set out in:
- (a) James Charalambous' email of 28 October 2010 (which also attached James' notes from the 22 October meeting) which appears at **BCC.024.0129** of the Bundle; and
 - (b) an email from Peter Baddiley on 28 October 2010 which appears at **BCC.024.0157** of the Bundle.
22. In relation to the 29 October 2010 meeting, to the best of my recollection:
- (a) the meeting was attended by Peter Baddiley and Jimmy Stewart as representatives of BoM, John Tibaldi and Terry Malone as representatives of Seqwater and James Charalambous and myself as representatives of Council;
 - (b) it was discussed that Council would be added to Seqwater's distribution list to receive information about releases that would have an impact on bridges further up the river;

- (c) we discussed what constituted a minor flood level in Brisbane. Council noted that fairly low levels started to affect the ferries and discussed whether the official level of minor flooding should be lower than BoM's trigger level of 1.7 metres AHD. However, BoM pointed out that low levels of flooding could be achieved by astronomical tides rather than actual flows in the Brisbane River and it was agreed that the BoM's trigger level would not be changed;
 - (d) as set out in my notes, James Charalambous, Jimmy Stewart and Terry Malone would meet separately to discuss each agency's ratings further; and
 - (e) that all three agencies would hold the next technical meeting on 9 November 2010.
23. I do recall attending the 9 November 2010 meeting at BoM's offices, however I did not take any notes at this meeting. To the best of my recollection:
- (a) BoM's representatives at this meeting were Peter Baddiley and Jimmy Stewart;
 - (b) Council's representatives at this meeting were Ken Morris, James Charalambous, Rob McGlenn, Chris Wilson and myself;
 - (c) I do not recall who, if anyone, from Seqwater attended this meeting; and
 - (d) BoM gave a general presentation in relation to its systems.

22 December 2010 to 9 January 2011

24. I was scheduled to be on annual leave from 22 December 2010 until after 19 January 2011. Although I did go on annual leave from 22 December 2010, I recall receiving a call from James Charalambous around mid-morning on 10 January 2011 informing me that the FIC was standing up. Therefore, I returned to work in the afternoon of 10 January 2011 at around 3.30pm.
25. During the January 2011 flood event, the FIC Controllers worked in shifts. From Monday 10 January 2011 to Friday 14 January 2011 (both days inclusive), I was rostered to work in the FIC from 4pm to midnight, however in the circumstances, I often arrived at the FIC office earlier than my scheduled shift and would stay longer.
26. I did not check my Council email account while I was on annual leave, however I did receive sms alerts on my mobile phone from the Floodwise system. Normally when I return to work from leave, my usual practice is to review emails received during my absence. However when

I returned to work on 10 January 2011, because I was returning to work to operate the FIC, I did not have time to go through any of the emails which the FOC may have sent to me from 22 December 2010 to 9 January 2011. As time permitted through the course of the week, I looked at a few of the emails received while I was away.

Monday 10 January 2011 to Friday 14 January 2011

27. I arrived at the FIC office between about 3pm and 3.30pm on Monday 10 January 2011.
28. My FIC shift was from 4pm to midnight from Monday 10 January 2011 to Friday 14 January 2011. As FIC team leader, my role predominantly involved:
- (a) receiving forecasts from BoM;
 - (b) liaising with BoM;
 - (c) dealing directly with questions that were raised from the Local Disaster Coordination Centre (LDCC); and
 - (d) providing oversight in tasks and decision making undertaken by the other FIC technical operators, including oversight in relation to the FIC technical operators:
 - (i) entering BoM forecast information into an interpolation programme;
 - (ii) preparing FIC situation reports based on the outcome of the interpolations; and
 - (iii) providing this information to the LDCC.
29. Accordingly, from Monday 10 January 2011 to Friday 14 January 2011, my communications were predominantly with the LDCC or with other members of the FIC.
30. Neither the Seqwater Log nor the FIC Log record any calls between the FOC and myself during this period. I have an unclear recollection of having a conference call on Wednesday 12 January 2011 in relation to the expected flood levels. Although I think this call was with the FOC, I am not 100% certain that it was and it may have been with BoM. I recall discussing what the predicted level was going to be at the City Gauge and that it was going to be lower than what had been originally predicted. Although I think Don Carroll of the FIC may have been on this call with me, I am not certain.

Saturday 15 January 2011

31. From Saturday 15 January 2011, I went back on annual leave until after 19 January 2011.

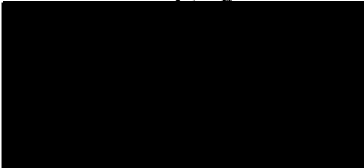

Evan Ross Caswell

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I make this statement conscientiously believing the same to be true, and by virtue of the provisions of the Oaths Act 1867 (Qld).

Dated 18 April 2011

Signed and declared by Evan Ross Caswell at
in the State of Queensland
this *18th* day of *April* 2011
Before me:



The person before whom the declaration is



Signature of declarant

Tanya Santada Solicitor

Full name and qualification of person before whom the
declaration is made



Evan Ross Caswell

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