

**QUEENSLAND FLOODS
COMMISSION OF INQUIRY**

STATEMENT OF PETER HUGH ALLEN

I, **PETER HUGH ALLEN**, of c/- 41, George Street, Brisbane in the State of Queensland, Project Director (Dam Safety), Office of the Water Supply Regulator, Department of Environment and Resource Management (DERM), state on oath:

Requirement from Queensland Floods Commission of Inquiry

1. I have seen a copy of a letter dated 2 February 2012, which is attachment **PHA-56**, from the Commissioner, Queensland Floods Commission of Inquiry (the Commission) to me requiring a written statement under oath or affirmation, and which details the topics my statement should cover.
2. I have previously provided sworn statements to the Commission as follows:
 - a. statement dated 4 April 2011.
 - b. addendum dated 11 April 2011.
 - c. supplementary statement dated 13 May 2011.
 - d. statement dated 12 September 2011.
 - e. statement dated 16 September 2011.
 - f. statement dated 24 November 2011.

Role

3. Paragraph 4 of my statement dated 24 November 2011 provides details of my current role and employment with DERM.

Item 1: His knowledge of the circumstances which led to the engagement of Mr Brian Cooper by the South East Queensland Water Grid Manager to conduct an independent review of the operation of Wivenhoe Dam (including controlled releases) for compliance against The Manual of Operational Procedures for Flood Mitigation at Wivenhoe Dam and Somerset Dam (Revision 7).

4. I did not make the decision to have an independent review of the performance of flood operations at Somerset and Wivenhoe Dams during the January 2011 flood event. I also did not decide who was to be chosen as an independent reviewer of the operations of those dams during the January 2011 flood event. I was however contacted by telephone by Mr Peter Borrowes of Seqwater on 11 January 2011 and

asked who might be appropriate to undertake such a review. On the same day, I discussed this issue via telephone with Debbie Best, Deputy Director-General, DERM. I also had a telephone conversation with Mr Paul Heinrichs of the New South Wales Dam Safety Committee. Through my telephone conversation with Mr Heinrichs, we came up with several names of potential candidates who may be suitable to undertake such a review which I provided to Debbie Best by email on 11 January 2011 (see attachment PHA-57). One of the potential candidates was Mr Cooper.

5. Later that day, I provided further details about Mr Cooper to Debbie Best and referred her to the New South Wales Dam Safety Committee website (see attachment PHA-58).

Item 2: His involvement in the engagement of Mr Cooper.

6. Apart from the involvement indicated in Paragraph 4 and 5, I did not have any further involvement in engaging Mr. Cooper.

Item 3: Any communications Mr Allen had with Mr Cooper, including (but not limited to) any briefings or instructions he gave to Mr Cooper and any discussions with Mr Cooper about his report/s.


7. I recall that Mr Cooper initiated a meeting with me to discuss the requirements of the Flood Mitigation Manual. I recall that I took this opportunity to show him the Flood Operations Centre so that he could understand what was in place to facilitate the flood operations. I have no record of when that was as I did not retain records of this meeting.
8. The only other communications I recall being involved in with Mr Cooper was peripheral in nature, namely by being copied into some emails sent from Seqwater to Brian Cooper Consulting providing him with copies of Technical Situation Reports for his review (see Attachment PHA-59).

Item 4: Any communications Mr Allen had with others about the engaging of Mr Cooper, Mr Cooper's report/s, and the use to be made of Mr Cooper's report/s.


9. As far as I can remember, the involvement detailed in paragraphs 4 and 5 above was the only involvement that I had in the engagement of Mr Cooper.
10. As stated in my previous statements, I was also advised by a number of Seqwater officers that Seqwater had arranged for a number of internal reviews of the report prior to its submission to DERM. I have not seen the results of these internal reviews. I understand they were provided to the Commission of Inquiry.
11. I received a copy of Mr Cooper's final report from Seqwater on 13 January 2011 (see Attachment PHA-60). I am aware of a letter being sent by Mr John Bradley, the then Director-General, DERM to Mr Borrows about improvements identified by Mr Cooper that Seqwater could implement to improve the application of the Draft Communications Protocol between government agencies and local governments (see Attachment PHA-61).

12. I will consider Mr Cooper's report before finalising my review of the flood operations for Wivenhoe and Somerset dams for the January 2011 flood event. I anticipate my review may be finalised by about June 2012.

I make this solemn statement on oath conscientiously believing the same to be true, and by virtue of the provisions of the *Oaths Act 1867*.

Signed . . .  .
Peter Hugh Allen

Taken and declared before me, at Brisbane this 3rd day of February 2012


Solicitor/~~Barrister~~/Justice of the
Peace/~~Commissioner~~ for Declarations