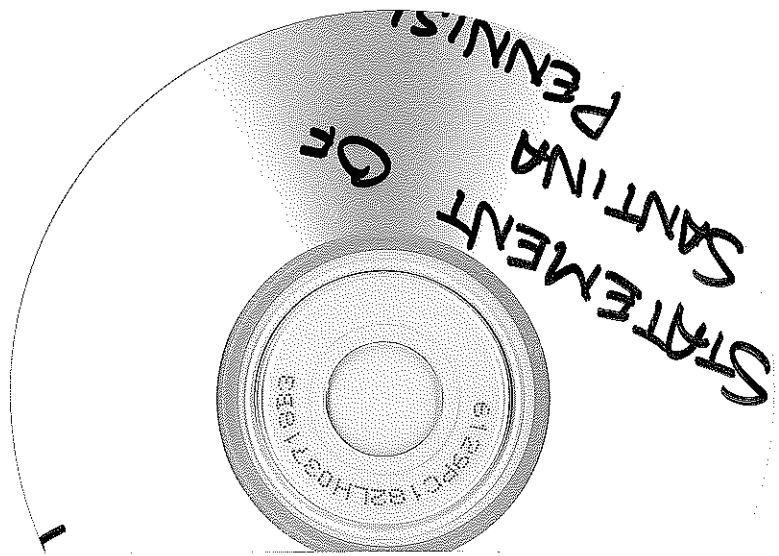


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Date: 19/05/11

Exhibit Number: 436

Statement of Santina Maria Rita Pennisi

I, **Santina Maria Rita Pennisi**, 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 (Civil) from Queensland University of Technology. My area of expertise is hydrology and hydraulics.
2. My current role in Brisbane City Council (**Council**) is Senior Engineer - Design Manager for the Flood Management unit of City Design. I have held this position from around April 2009. I first commenced employment with Council in February 1996 as a graduate contract engineer. Since 1995, I have been engaged as a professional engineer in various consultancy and government agency roles, including different roles within Council.
3. Attachment "**SMRP-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. I am informed that 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. For the purposes of preparing this statement, I have:
 - (a) extracted and reviewed the emails from my Council email account to and from the FOC during the relevant period;
 - (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 "**SMRP-2**" is a copy of the FIC Log; and


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- (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 "**SMRP-3**" is a copy of the un-redacted FOC Log.

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

Flood Information Centre and Flood Operations Centre

7. Where there is a possibility of a Brisbane River flood event, Council's FIC is activated. The FIC's members are mostly officers from Council's City Design section together with engineers from the Flood Management unit. The FIC Controllers are predominantly senior engineers of Council's Flood Management unit within the City Design section. I have been a FIC Controller from about July 2009.
8. I am aware that the FOC manages the release of water from the Wivenhoe or Somerset Dams. My understanding is that the FOC is comprised of staff from Seqwater and SunWater.
9. I am informed that 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

Communications with the FOC

10. I sometimes took notes during my discussions with the FOC. Attachment "**SMRP-4**" is a copy of my handwritten notes of my discussions with the FOC during the period referred to in the Notice (the Notes).
11. Attachment "**SMRP-5**" 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,


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during the period 1 October 2010 and 19 January 2011 (the **Bundle**). 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 November 2010

12. I was not working from 4 May 2010 until my return to work on Monday 22 November 2010. Accordingly, I did not have any communications with the FOC during this time.

22 November 2010 to 9 January 2011

13. When I returned to the office on Monday 22 November 2010, I recall that Ken Morris and Evan Caswell provided me an informal briefing in relation to developments during my absence from work. In particular, I was informed that the three key agencies, Seqwater, the Bureau of Meteorology (**BoM**) and Council, had held a series of meetings to discuss their technical capabilities, operating procedures and communication protocols.
14. I recall that from around 6 December 2010, informal arrangements were implemented whereby an FIC on-call duty engineer from Council's Flood Management Section was rostered on to be available 24 hours a day, 7 days a week to respond to creek flash flood events. This role is in addition to the rostered engineer's day-to-day duties and the purpose of the role was to support Council's disaster operations.
15. I was the FIC on-call duty engineer on the following dates:
- (a) Tuesday 7 December 2010 to Tuesday 14 December 2010 (both days inclusive);
 - (b) Monday 27 December 2010; and
 - (c) Wednesday 29 December 2010 to Monday 3 January 2010 (both days inclusive).
16. As the FIC on-call duty engineer, the majority of the emails that were sent or copied to me from the FOC were FOC situation reports and reports on the actual and projected releases from Wivenhoe dam.
17. When I am rostered as the FIC on-call duty officer, my usual practice is to:
- (a) review the weather forecasts received from the BoM and monitor the Floodwise website;

- (b) where water is to be released from the Dams, review the emails from the FOC and, when necessary, liaise with the FOC and the BoM;
- (c) consider what the impact of the FOC's actual and projected dam release rates would be downstream using, when available, the BoM's registered user website showing predicted water levels for the River City reach;
- (d) prepare a FIC situation report based on this information; and
- (e) provide the FIC situation report to the Disaster Operations Manager of the Local Disaster Coordination Centre (**LDCC**), who I recall at the time was Chris Lavin.

18. During the time before the January 2011 flood event, I also recall contacting the FOC by telephone on some occasions because I thought it would be a good opportunity to open the lines of communication with the FOC. My recollection of my telephone discussions with the FOC is set out in the following paragraphs.

Monday 27 December 2010

19. As recorded in my Notes, on 27 December 2010 at around:

- (a) 7.50am, I telephoned Terry Malone of the FOC. I recall that Terry and I discussed the flows in the upper Brisbane River and Terry informed me that the Wivenhoe Dam discharges would be gearing up over the next few days;
- (b) 11.20am, I telephoned Terry Malone again. Terry informed me that the FOC was considering Wivenhoe Dam discharge rates as a result of logistics around bridge closures downstream. Subsequent to my discussions with Terry, I received the FOC situation report dated 27 December 2010 at 12.57pm which appears at **BCC.022.0324** of the Bundle; and
- (c) 5.00pm, I made a further telephone call to Terry Malone and I recall that we spoke about the rainfall as there had been a large amount of rainfall in the upper catchment area. To the best of my recollection, the FOC were looking at delaying releases from Wivenhoe Dam until the next morning because they were waiting for the Lockyer peak to pass. The email at **BCC.022.0355** of the Bundle dated 28 December 2010 at 3:07pm reflects this discussion with Terry Malone.

Wednesday 29 December 2010

20. At around 7:20am on 29 December 2010, I telephoned the FOC and spoke to a "Mark" however I do not know the surname of this individual. I recall that we discussed that releases from the Wivenhoe Dam would be ramped up throughout the day to a peak release rate later that night. As recorded in my Notes, subsequent to this discussion with the FOC, I received an email from the FOC regarding the dam release strategy. A copy of this email appears at **BCC.022.0365** of the Bundle and is dated 29 December 2010 at 7.24am.

Thursday 30 December 2010

21. I recall telephoning the FOC sometime in the afternoon on 30 December 2010. I cannot recall the exact time of the telephone call, but I do remember that I spoke with Terry Malone of the FOC.
22. I recall that the purpose of my call was to obtain information in relation to discharges from Lake Manchester in order to provide advice to Council's SES controller, Lowry Boyd. As Lake Manchester was a free flowing dam, Terry suggested that I use the Floodwise website. I did not make a record of this telephone conversation.

Friday 31 December 2010

23. At around 8.20am on 31 December, I telephoned the FOC and I recall that I spoke with Terry Malone. I recall that I had telephoned Terry in order to discuss the predicted water level in the Brisbane River as a result of the forecast rainfall and the projected releases from the Dam. To the best of my recollection, Terry suggested that I speak with the BoM in this regard. My Notes at **BCC.040.0006** reflect this telephone discussion.
24. I also recall that some time after the FOC email of 31 December 2010 at 12.23pm (which appears at **BCC.022.0395** of the Bundle), I telephoned the FOC to generally discuss the release rates before preparing the next FIC situation report. I cannot accurately recall what time I telephoned, however I do recall speaking with Terry Malone of the FOC. I did not make a note of this telephone conversation.

Friday 7 January 2011

25. I recall having a discussion with Terry Malone of the FOC around 2pm or 3pm on 7 January 2011. Although I cannot specifically recall the time of this call, I note that the FOC's email dated 7 January at 3.09 pm was subsequent to my telephone discussion with the FOC and

reflects my discussions with Terry. A copy of this email appears at **BCC.022.0427** of the Bundle.

26. To the best of my recollection, I telephoned Terry to enquire in relation to flows in the River as a result of a combination of release rates and an oceanic anomaly in that extra high tides were predicted. I recall that Terry referred me to the BoM. I did not make a note of this telephone conversation.

Monday 10 January 2011 to Wednesday 19 January 2011

27. During the January 2011 flood event, my FIC shift was from 8am to 4pm, however, I often arrived at the FIC office at around 7am and would stay longer than my rostered shift time.
28. On Monday 10 January 2011, I arrived at the FIC office at Greensquare in Fortitude Valley at around 7.30am. After I arrived at work and before about 9.30am, I received a telephone call from an officer of Council's Disaster Management Group. I cannot specifically recall who the officer was. I was informed that they required a senior representative from the FIC to brief the Lord Mayor and Council's CEO. It was agreed that I would attend a briefing session on Monday 10 January 2011 at Brisbane Square from around 10am.
29. After the Monday 10 January 2011 briefing session, the first meeting of the Local Disaster Management Group (**LDMG**) was held on Tuesday 11 January 2011 at around 10am at the Roy Harvey House on Ann Street. From Tuesday 11 January 2011 to Saturday 22 January 2011, the LDMG meetings were generally held from around 10am to between 12pm and 1pm each day. During this period, I generally attended the LDMG meetings as the FIC's representative, although I did not attend on Sunday 16 January, Thursday 20 January and Friday 21 January 2011.
30. Accordingly, from around 10am Monday 10 January 2011 to Wednesday 19 January 2011, my role within the FIC was to:
- (a) be the FIC Controller for my shift;
 - (b) obtain a briefing from the previous shift's FIC Controller (usually James Charalambous) in relation to the previous night's events;
 - (c) review the latest BoM forecasts and FOC situation reports;
 - (d) prepare a verbal briefing on behalf of the FIC and attend the LDMG meetings on behalf of the FIC; and


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- (e) after the LDMG meetings, if necessary, attend the LDCC to assist with their operations.
31. As a result of my role in briefing the LDMG, my communications during the January 2011 flood event were primarily with the LDMG, the LDCC and other members of the FIC. Neither the Seqwater Log nor the FIC Log record any calls between the FOC and myself during this period.
32. However, I note the entry in the Seqwater Log at 9.38am on 10 January 2011 records as follows:
- "Conference call with Ken Morris (BCC) - informed them that release from Wivenhoe will be maintained at 2000m³/s for the next 24 hrs. This will be revised in 24 hrs. The strategy is to limit the flows to 3000 - 3500m³/s. At 3500m³/s about 322 (the whole property) will be submerged and about 7000 properties will be affected somehow damage bill \$7mil). If the rainfall in the Bremmer and Lockyer increases substantially - it is likely the flows from these catchments can peak at 1000m³/s (on top of Wivenhoe release)"*
33. I recall participating in this conference call prior to attending the Lord Mayor and CEO briefing on 10 January 2011. To the best of my recollection:
- (a) Ken Morris, Don Carroll, James Charalambous and myself were on the call on behalf of the FIC;
- (b) Terry Malone and John Tibaldi were on the call on behalf of the FOC;
- (c) we were informed by the FOC that their release strategy would be modified to release up to 2,000 cumecs in the next 18-24 hours but this would depend on the impending rain. As set out in my Notes for 10 January 2011, the figure of 3,500 cumecs was presented by the FOC as a worst case scenario, although their aim was to hold releases back to 2,000 cumecs; and
- (d) FOC would issue a new strategy update around lunch time.
34. I do not specifically recall discussion in relation to the following aspects of the Seqwater Log record: *"At 3,500 cumecs 322 (the whole property) will be submerged and about 7,000 properties will be affected somehow damage bill \$7 mil. If the rainfall in the Bremmer and Lockyer increases substantially - it is likely the flows from these catchments can peak at 1000m³/s (on top of Wivenhoe release)"*.

35. Immediately after this call, I left the FIC office to attend the 10 January 2011 Lord Mayor and Council CEO briefing session in Brisbane Square.

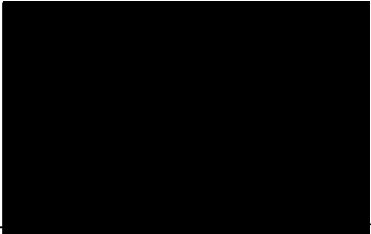
I make this statement conscientiously believing the same to be true, and by virtue of the provisions of the Oaths Act 1867 (Qld).

Dated 19 April 2011

Signed and declared by Santina Maria Rita
Pennisi at Brisbane
in the State of Queensland
this 19th day of April 2011
Before me:



declaration is



Signature of declarant

Tanya Santada, Solicitor
Full name and qualification of person before whom the
declaration is made



Santina Maria Rita Pennisi

