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To the Commissioners
Commission of Inquiry – Paradise Dam

Rationale for Paradise Dam Commission of Inquiry to consider the submission of Dr Paul Rizzo Ph.D. P.E.

Given the significant community, agricultural and economic impacts of any deconstruction of the Paradise Dam, Bundaberg Fruit and Vegetable Growers Cooperative Limited (BFVG) believe it is critical to consider the report of Dr. Paul Rizzo Ph.D. P.E., an internationally recognised expert in geotechnical, civil, and seismic engineering.

Dr Rizzo's extensive experience includes seismic issues and safety evaluations of nuclear power plants, major dams, and other structures. He has served on numerous panels, committees, and consulting boards charged with the deliberation of seismic hazard evaluation, seismic design basis, soil-structure interaction, and other issues related to geotechnical engineering.

Dr Rizzo visited the Bundaberg Region and specifically Paradise Dam in late January 2020 on a fact-finding mission as part of a study commissioned by Bundaberg Fruit and Vegetable Growers (BFVG) through its lawyer Batch Mewing Lawyers to assess geotechnical testing undertaken to date and possible outcomes for the dam from complete remediation to decommissioning.

His initial Letter Report titled *Recommended Testing Program, Paradise Dam* is relevant to the structural and stability issues identified in engineering and technical studies conducted on the Paradise Dam between 30 January 2013 and 30 November 2019.

His view is that 'the existing data set as critically reviewed by Tatro Hinds is inadequate, misleading and insufficient to assess the integrity and safety of Paradise Dam'.

As well as the testing procedures and report on which current proposed actions by Sunwater have been based, Dr Rizzo's expert evidence also has relevance to the design, construction and standards for future Queensland dam projects based on global benchmarks for engineering good practice.

Dr Rizzo's initial letter report is attached, as is the list of documents referred to in the Paradise Dam Preparedness Review Report which we are currently seeking access to so that Dr Rizzo can complete his expert assessment of safety and rehabilitation options.

As well as offering the opportunity for the Commission of Inquiry to seek further expert particulars from Dr Rizzo on this submission, we request that the Commission provide access for us to the documents listed which have not been forthcoming from Sunwater to date.

Kind regards

Bree Grima
Managing Director
Bundaberg Fruit and Vegetable Growers Cooperative Limited

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