

Oaths Act 1867

Statutory Declaration

**QUEENSLAND
TO WIT**

I, William John Campbell Curlewis, of [REDACTED] in the State of Victoria, do solemnly and sincerely declare that:

1. I have received a document titled 'Requirement to Give Information and Answer Questions' dated 12 March 2020 from the Honourable John Byrne AO RFD, Commissioner and Chairperson appointed pursuant to *Commissions of Inquiry Order (No 1) 2019* to inquire into certain matters pertaining to the design, construction and commissioning of the Paradise Dam (Dam) which requires me to give certain information to the Commission.
2. The information requested is set out below.

Employment Details

3. I was employed by Hydro-Electric Corporation trading as Hydro Tasmania in connection with the construction of the Dam as a design support engineer during the period from 19 July 2005 to 9 December 2005.
4. My role as a design support engineer involved the following day to day activities:
 - (a) conducting daily inspections of site works and comparing site conditions to design drawings to ensure that the works were being constructed in accordance with the design intent;
 - (b) reviewing requests for information and non-conformance reports received from site engineers and either responding to those requests and reports or passing them on to the relevant designer for a response;
 - (c) passing on responses to the requests for information and non-conformance reports to the relevant site engineer;
 - (d) attending site meetings; and
 - (e) keeping the Design Team, including Richard Herweynen and Tim Griggs (and in some cases, other engineers), informed of all relevant matters.

Quality Management Plan

5. I was not aware of the Quality Management Plan during my time as a design support engineer for the Paradise Dam.
6. This document does not appear to allocate any specific responsibilities to the design support engineer.

RPEQ Sign Off for Impoundment

7. In my role as the design presence on site I undertook the activities referred to in paragraph [4] above.
8. These activities were related to the following aspects of the design and construction of the Dam:
 - (a) the placement of a small amount of roller compacted concrete (RCC) on the left abutment of the Dam (to the best of my recollection the majority of the RCC placement had been completed by the time I commenced on site);
 - (b) the capping of the main spillway and abutments with reinforced conventional concrete; and
 - (c) various other reinforced concrete structures and miscellaneous works being completed during my time on the project.
9. I do not recall providing Mr Herweynen with information specifically for the purpose of allowing him to provide RPEQ sign off for impoundment. However, I regularly provided Mr Herweynen with information relating to the progress of the works on site through the following:
 - (a) I recorded details of my daily site inspections in a database, including details of when the inspection took place, what was inspected and any issues that were observed;
 - (b) I kept Mr Herweynen informed about any issues that arose through regular telephone discussions and email correspondence;
 - (c) I passed on any relevant requests for information and non-conformance reports received from the site engineers to Mr Herweynen and engaged with him about responding to those requests and reports where necessary; and
 - (d) I undertook regular site inspections with Mr Herweynen (and other engineering visitors) and discussed any issues with him during those site inspections.

10. I do not recall undertaking any inspections specifically for the purposes of RPEQ Sign Off for impoundment. However, as I have set out above, I undertook daily inspections of the site in my role as a design support engineer for the project.
11. My responsibility for ensuring that the placement of the RCC met the design requirements was limited due to the fact that the majority of the RCC placement had been completed by the time I arrived on site. In respect of the small amount of RCC that was placed while I was on site, the steps that I took to ensure that the placement of that RCC met the design requirements are set out in paragraph [4] above and included observing the works that had been completed to confirm they met design intent and communicating with the Design Team to address any non-conformance reports or requests for information relating to the works.
12. I did not have any responsibility for ensuring that the construction of the primary spillway apron met the design requirements as I believe that construction of the primary spillway apron had been completed by the time I arrived on site.

RPEQ Sign Off for Practical Completion

13. I do not recall having any specific involvement in the RPEQ design sign off outside undertaking my day to day tasks outlined in paragraph [4] above.

Detailed Construction Report

14. I do not know whether the details of the construction report outlined in DNR.008.3319 at 3320 to 3324(inclusive) comprised the whole of the detailed construction report prepared for the Dam. My role in relation to the construction report was limited to providing input into specific aspects of the report in the form of information or documentation (for example, in relation to the closing out of a non-conformance report), collating design information and some as built drawings, and preparing drafts of specific sections for the report which were then reviewed by relevant member of the design team including Tim Griggs and/or Richard Herweynen.
15. My recollection is that the construction report was an actual report which provided a detailed summary of the construction process for the Dam, and that it was not limited to a compilation of the relevant quality assurance documentation.
16. I believe that Paul Rickett was responsible for collating the construction report with input from all members of the Burnett Dam Alliance
17. I believe that the types of matters addressed in the construction report were the matters outlined in DNR.008.3319 at 3320 to 3324 (inclusive). However, given the

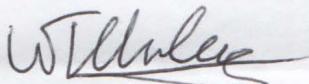
limited nature of my role in connection the report, I cannot say with certainty exactly what was or was not included in the report.

18. I was involved in the delivery of the detailed construction report to representatives of Sunwater. My involvement was to assist Paul Rickett with collating relevant documents and loading them into a shipping container which then delivered by truck to Sunwater. I believe this occurred around 8 December 2005.

Due Diligence and 2006 Core Sample

19. I do not recall ever receiving a copy of SWA.505.001.0014 from Sunwater.
20. I also do not recall being requested by any person to provide information in respect of this report or to respond to any other due diligence enquiry related to this report.

And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the Oaths Act 1867.



William John Campbell Curlewis

Declarer

Taken and declared before me at *Chemist
Warehouse
Melbourne* this *19th* day of March 2020, before me.



Carolyn Ming Chin Tsai

I (B Pharm)

Solicitor/ Justice of the Peace/Commissioner for Declarations



MELBOURNE

Claudio Avendano

Shop L2, London Stores, 345 Bourke St.,
MELBOURNE, VIC. 3000
PH: (03) 9671 3833 FAX: (03) 9639 0559
ABN: 90492037181 Approval No: 24240T