



THE HORSHAM FIRE

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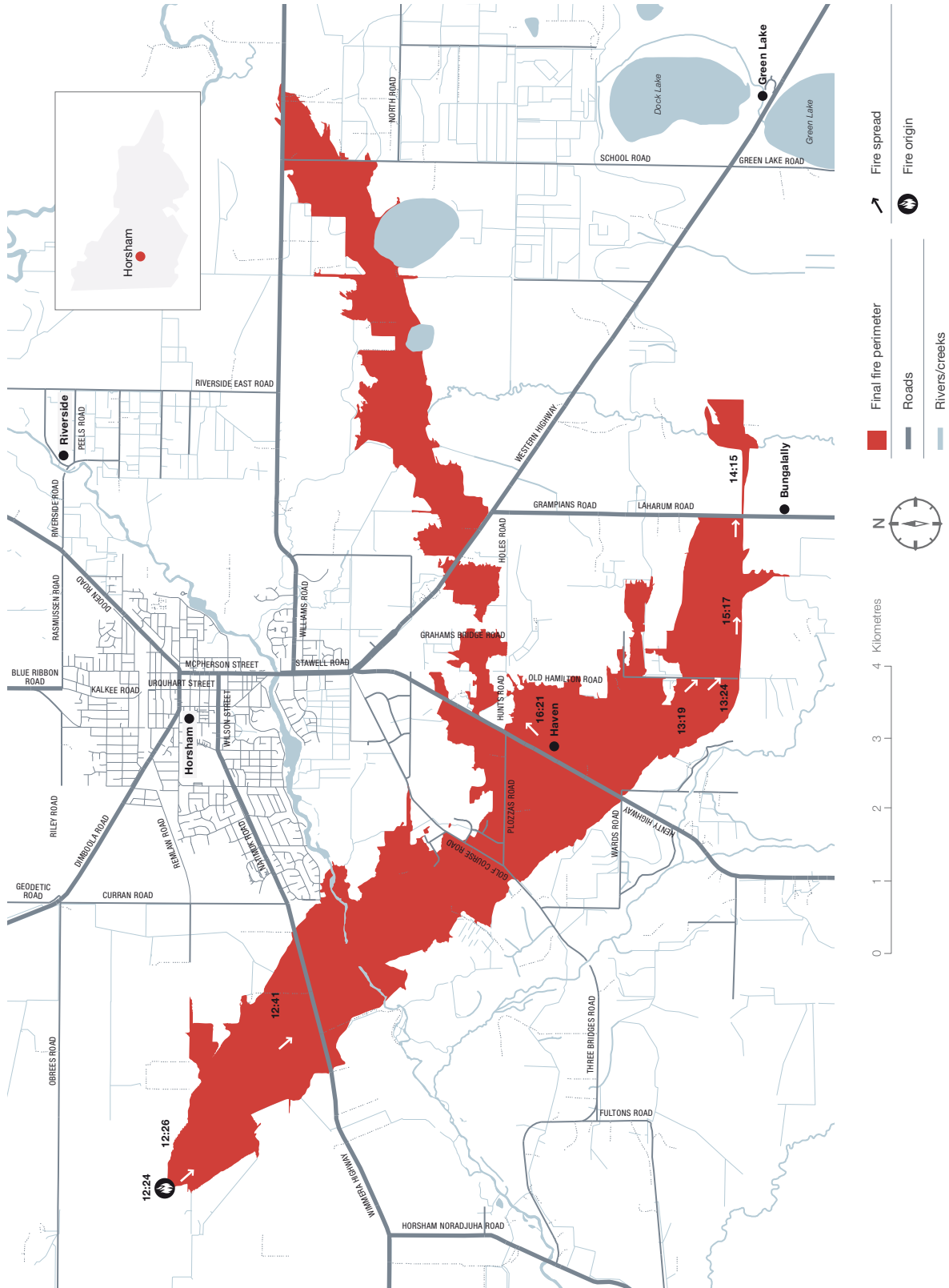
Horsham Rural City is about 300 kilometres north-west of Melbourne, in the Wimmera region. The areas directly affected by the fire of 7 February 2009 were Vectis and Haven, to the west and south of Horsham respectively.<sup>1</sup>

The Horsham fire ignited at about 12:20; it was a grass fire and in the first hour spread rapidly, covering just over 10 kilometres. Initially it travelled south-east, past the western edge of Horsham, before crossing the Wimmera River. When the wind changed it travelled east-north-east, south of Horsham. The fire was stopped at about 18:00, having burnt 13 houses, many other structures, and livestock and hay. Figure 6.1 shows the extent of the fire.

## OVERVIEW

<b>Maximum temperature</b>	The maximum temperature recorded was 47.6°C at Horsham. <sup>2</sup>
<b>Minimum relative humidity</b>	The minimum relative humidity recorded was 8 per cent at Horsham automatic weather station at 14:00. <sup>3</sup>
<b>Wind</b>	The maximum winds recorded before the south-westerly wind change were north-westerly at 63 kilometres an hour at Horsham AWS at 12:59. <sup>4</sup> The south-westerly wind change was recorded by the Horsham AWS at 16:28 at 61 kilometres an hour. <sup>5</sup> The maximum winds recorded after the south-westerly wind change were south-south-westerly at 46 kilometres an hour at Horsham AWS at 17:49. <sup>6</sup>
<b>Fire danger index</b>	The maximum Grassland Fire Danger Index was 312 at Horsham AWS at 13:00. <sup>7</sup>
<b>Cause</b>	Electrical failure. <sup>8</sup>
<b>Fatalities</b>	No fatalities. <sup>9</sup>
<b>Casualties</b>	No casualties. <sup>10</sup>
<b>Houses destroyed</b>	Thirteen houses. <sup>11</sup>
<b>Overall area burnt</b>	2,346 hectares. <sup>12</sup>
<b>Firefighting resources</b>	On 7 February, 168 CFA and 186 NEO personnel attended the fire. They were supported by 47 CFA appliances, 34 NEO appliances and 4 aircraft. <sup>13</sup>

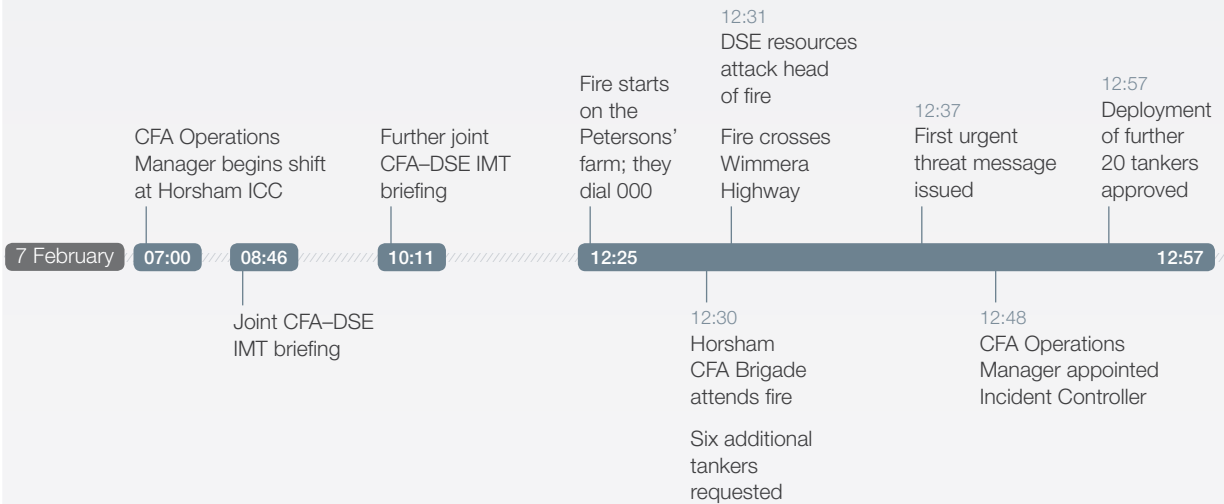
Figure 6.1 The Horsham fire

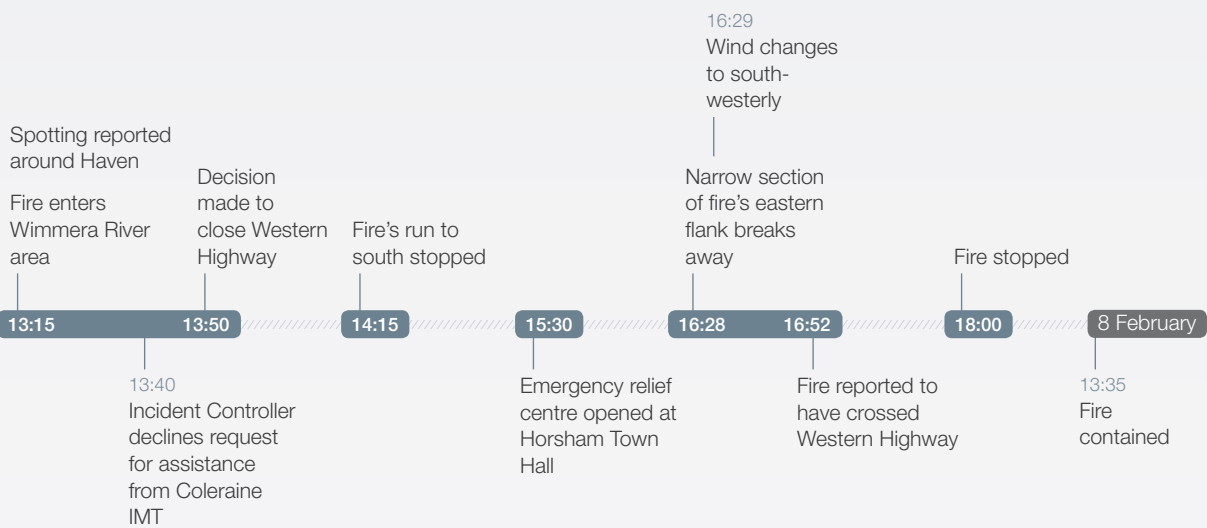


Source: Exhibit 994 – Vectris Fire – Fire Spread Map.<sup>14</sup>

## Horsham 7–8 February

The following time line summarises events associated with the Horsham fire. For the most part, the times given are approximate. Further details about the events are provided in the accompanying narrative.





## 6.1 SEQUENCE OF EVENTS

### 6.1.1 PREPARATION

On 4 February Mr Dale Russell, Operations Manager for Country Fire Authority Region 17, spoke with Mr Geoff Evans, the Department of Sustainability and Environment Manager of Land and Fire for Wimmera District, to establish incident management team plans for the forthcoming total fire ban days—in particular, 7 February. Staff were rostered off earlier in the week to ensure that as many as possible were available on 7 February.<sup>15</sup>

Mr Russell was aware that every level 3 incident control centre had to be ready for a ‘hot start’ on 7 February, which he understood to mean that each incident control centre was to be staffed and immediately ready to begin dealing with an incident. Measures were introduced to allow for a staggered start on 7 February. An AIIMS (Australasian Inter-Service Incident Management System) structure sheet had been prepared on 6 February: it outlined the incident management team roles for the day shift on 7 February, involving 42 people.<sup>16</sup>

In the lead-up to 7 February fire crews were allocated and firefighting appliances were formed into strike teams to be sent to other regions if required. In addition, fire spotters were detailed for aerial surveillance.<sup>17</sup>

Mr David Eltringham, Municipal Emergency Resource Officer for Horsham Rural City Council, and Sergeant Damien Ferrari, Municipal Emergency Response Coordinator, ascertained the availability of water carts and pre-positioned earth-moving equipment west of Horsham in order to reduce the response time if a fire came from the west; this step was taken because of the forecast and the expected wind change. They received regular updates, including weather forecasts, from other agencies—particularly the CFA and DSE.<sup>18</sup>

Table 6.1 summarises the state of preparedness for the Horsham fire.

**Table 6.1 The Horsham fire – IMT preparedness**

<b>Pre-designated level 3 ICC</b>	Yes <sup>19</sup>
<b>Pre-formed IMT at ICC</b>	Yes <sup>20</sup>
<b>Pre-identified level 3 IC</b>	Yes <sup>21</sup>
<b>Pre-identified IMT members</b>	Yes <sup>22</sup>
<b>Time fire started</b>	12:20 <sup>23</sup>
<b>Time full IMT in place</b>	Approx 10:11, 7 February 2009 <sup>24</sup>
<b>Safety adviser appointed</b>	No <sup>25</sup>

### 6.1.2 7 FEBRUARY

The Incident Control Centre at Natimuk Road in Horsham is a DSE work centre in CFA Region 17. It had been set up as a joint CFA–DSE level 3 ICC. At 07:00 Mr Russell began his shift. At 08:46 he and Mr Evans conducted an incident management team briefing and discussed the IMT structure chart, the weather conditions expected for the day, the availability of graders and dozers, and other matters. They had planned that there would be a staggered start at the Horsham ICC in order to ensure staggered shift finishes.<sup>26</sup>

At 10:11 Mr Russell and Mr Evans held a further IMT briefing as the pre-arranged personnel arrived at the Horsham ICC. By the time of the second briefing one fire spotter aircraft was already in the air. One of the two spotter aircraft was in the air all day.<sup>27</sup>

#### Origin and cause

At 12:20 the power went off at the home of Mr Alan Peterson. Shortly after this he observed blue smoke in the direction of the power line that ran across his farm. At 12:25 the Petersons telephoned 000.<sup>28</sup>

A single-wire earth return, or SWER, electricity line runs east–west across the Peterson property; the line is known as the Remlaw Spur and was constructed in 1963 or 1964. At some time before 7 February the first of the three coach screws that held the pole cap in place on top of pole 15 came out. The 7 February fire was started by a conductor that fell when the remaining two coach screws came loose as a result of wind-induced vibration enabling the pole cap to become detached.<sup>29</sup>

The failure of the pole cap to secure the conductor on pole 15 might have been avoided had there been a shorter inspection cycle: pole 15 had not been inspected for about four-and-a-half years. The risk of failures of the kind that started the Horsham fire would be reduced if centre-phase pole-top assemblies were replaced by new P-bracket pole-top assemblies.<sup>30</sup>

When the conductor hit the ground the fuse on the isolating transformer at the start of the Remlaw Spur operated as expected: it cut power by opening the circuit within 0.3 seconds. But sufficient current flowed before the fuse blew to cause the fire to start.<sup>31</sup>

Inspection cycles for electrical assets are discussed in Chapter 4 of Volume II.

### **Fire run, response and management**

Because the fire began on private property, the CFA became the lead agency and Mr Russell became the Incident Controller. Mr Graham Parkes of Parks Victoria was the Deputy Incident Controller.<sup>32</sup>

From its point of origin north of Remlaw Road in Vectis, the fire was fanned by strong winds; it moved rapidly, reaching a rate of spread averaging a little over 10 kilometres an hour in the first hour.<sup>33</sup>

The CFA responded at 12:27 and was at the fire, close to the point of origin, at 12:30. The initial response involved four tankers—the standard ‘hot day’ response. A further six tankers were requested immediately, and 10, then 20, then 30 tankers were subsequently deployed over a relatively short period. The aerial observer was at the scene of the fire less than 10 minutes after it started.<sup>34</sup>

The fire travelled south-east and, after crossing the Wimmera Highway at 12:31, entered a paddock containing only limited fuel. In favourable weather conditions there would have been a good chance of stopping the fire at this point. DSE personnel attacked the head of the fire but were unable to stop its spread.<sup>35</sup>

Having travelled along the south-western edge of Horsham, the fire crossed the Wimmera River and moved away from Horsham. CFA, DSE and private firefighters put a great deal of effort into securing the eastern flank of the fire in order to prevent the fire burning into the township of Haven and were largely successful.<sup>36</sup>

The first threat message for the fire was issued at 12:37, less than 20 minutes after the fire had started. The message warned that Haven, McKenzie Creek and communities through to Wonwondah might be directly affected by the fire. The Horsham Incident Control Centre issued threat messages at regular intervals throughout the afternoon.<sup>37</sup>

The majority of these messages were made available through the DSE website and reported on 774 ABC radio throughout the day. A number of the threat messages were, however, either not uploaded to the CFA website or reported out of time. For example, it appears that the CFA did not release the urgent threat message issued at 13:26.<sup>38</sup>

At 12:43 Mr Russell met with the operations officers in the Horsham ICC to discuss the communications plan and asked that the fire be sectorised because of the congestion on channel 77. CFA sector commander for the Haven area, Mr Robert McGenniken, described the situation as ‘pandemonium on the fire ground radio’. The congestion occurred because 30 tankers were sought independently, not in strike teams, creating communications and coordination problems.<sup>39</sup>

The Coleraine ICC contacted Mr Russell at 13:40 to ask for additional trucks to help with the Coleraine fire. Mr Russell advised that they were unable to release any trucks because of the fire at Horsham and suggested they contact the Regional Emergency Coordination Centre with the request.<sup>40</sup>

At 13:50 Mr Russell made the decision to close a 37-kilometre section of the Western Highway. By this time power company workers had already replaced the old pole cap with a new P-bracket pole-top assembly, restoring power to the area.<sup>41</sup>

Mr Russell and Mr Parkes issued a joint media release at 14:00, providing further information about the type and size of the fire and the roadblocks in operation. Shortly after this Mr Russell spoke with Mr Richard Bourke, Regional Duty Officer at the Regional Emergency Coordination Centre, about deploying strike teams to Green Lake (14 kilometres south-east of Horsham) in an effort to anticipate where the fire would go.<sup>42</sup>

The fire's run to the south stopped at 14:15. Mr Russell was informed by local brigade captain Mr Graham Hill at 14:47 that the Dimboola forward command vehicle had been involved in a burnover but that no-one had been injured. During the fire one CFA unit had requested a doorknock to notify residents of possible evacuation, but Mr Russell felt it was too dangerous to do that.<sup>43</sup>

The wind changed to a west-north-westerly at 15:17 and then to a westerly at 15:30. The fire turned east and travelled close to the southern edge of Horsham.<sup>44</sup>

An emergency relief centre was opened at Horsham Town Hall at about 15:30. About 90 people registered at the centre on 7 February; some of them had had their homes burnt.<sup>45</sup>

At 16:19 Mr Russell spoke again with Mr Bourke, confirming that an additional four tankers available at Donald, in Region 20, would be required. These strike teams went to the staging area at Horsham showground and from there were deployed to the fire.<sup>46</sup>

The fire then burnt into the back of the golf course and towards Golf Course Road. Once it had entered the golf course, the fairways funnelled it towards the clubhouse, which was destroyed. From Golf Course Road to Old Hamilton Road the fire ran as fingers, or tongues, rather than as a wall of flame. It was substantially checked at Old Hamilton Road, although part of it continued to the east. At times it spotted several hundred metres ahead of the main fire front.<sup>47</sup>

**Image 6.1**



Source: Courtesy of *Herald & Weekly Times*.



The wind swung further to the south-west at 16:29, and this drove the flames toward the east-north-east. The fire crossed Old Hamilton Road, spotted across Grahams Bridge Road, and continued across the Western Highway on the outskirts of Horsham, near the Wimmera Lakes Caravan Park. The rate of spread of the fire during this period was estimated at 2.2 kilometres an hour.<sup>48</sup>

At 17:00 Mr Russell authorised a further urgent threat message. It confused the direction of the wind with the direction of the fire and as a result wrongly said the fire was burning in a westerly (rather than easterly) direction and that it was expected to change to a south-westerly (rather than north-easterly) direction.<sup>49</sup>

ABC local radio in Western Victoria, however, appeared to have been broadcasting the correct details to the Horsham community. Throughout the afternoon Mr Parkes reported on air the effects of the wind change on the fire area, correctly naming the communities east and north-east of the fire as being at risk.<sup>50</sup>

The fire's forward spread was stopped at about 18:00, just north of the Horsham–Lubeck road.<sup>51</sup>

Despite a downgrade message being issued at 18:35, 3AW broadcast a warning at 19:00, referring to homes having been destroyed in Horsham and blazes 'currently threatening Haven, McKenzie Creek, Bugle Alley and Green Lake'.<sup>52</sup>

At 19:34 the fire in Horsham was announced as being 'less of a threat'. During an interview at 19:45 on 774 ABC radio. Mr Russell Rees, CFA Chief Officer, referred to '... a significant fire running in and around Vectis'.<sup>53</sup>

At 19:38 Mr Russell spoke with Mr Parkes and police about displaced local residents who had self-evacuated or been prevented from returning home by the roadblocks. There were 25 people in the Horsham Town Hall at that time. It was agreed that these people would be escorted home in order to allay their fears and enable them to extinguish any flare-ups at their homes during the night.<sup>54</sup>

The fire was declared contained at 13:35 on 8 February. The relief centre was closed on the same day. The Municipal Emergency Coordination Centre was de-activated on 11 February and became the Council's recovery centre.<sup>55</sup>

The Horsham fire was a 'classic grass fire that burnt under the influence of available ground fuel and weather factors such as: the prevailing wind, relative humidity and temperature'. Mr Russell described the firefighting effort on the day as 'guerrilla' firefighting: 'It is basically house-to-house combat. We were after asset protection. The weather was such that you could not really, in very close quarters here, mount a concerted attack on the front because there was no front as such'.<sup>56</sup>

At the fire's height 44 CFA tankers and about 30 DSE units of various types were involved, plus earth-moving equipment and private units. Mineral earth containment lines were constructed to secure the eastern flank of the fire to stop it entering Horsham.<sup>57</sup>

Although property was lost, the combined efforts of CFA and DSE personnel, landowners and private firefighting units, along with the absence of continuous fuel, limited the fire's impact. In all, 2,346 hectares were burnt and 13 houses were destroyed, as was the clubhouse of Horsham Golf Club. Numerous sheds, plus about 160 kilometres of fencing, 54 sheep, 226 other livestock and 484 tonnes of fodder and hay, were also lost.<sup>58</sup>

The Commission heard evidence of radio congestion problems resulting in the air observer, Mr Trevor Coulthard, being unable to get through to the Horsham IMT. It took 20 to 40 minutes before the problem was resolved, and during this time the fire was spotting profusely. Mr Russell expressed the view that these problems could not be resolved without creating further problems with radio coverage. Both Mr Coulthard and Mr McGennissen disagreed. Mr Coulthard opined that there should be a dedicated frequency for aircraft, as there had been until the mid-1990s. Mr McGennissen suggested that an alternative solution could be to use the regional channel.<sup>59</sup>

## 6.2 ROADBLOCKS

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Mr McGennissen described the impact of roadblocks restricting access for private firefighters: 'A lot of people were trying to get into the fire ground to gain access to give us help and were denied access. We can't afford that. We need those people here to help us. That's what makes the CFA so great, we all help each other'.<sup>60</sup>

Sergeant Mick Salter, the Deputy Municipal Emergency Response Coordinator and Assistant Forward Commander for the police, agreed that total road closures at roadblocks were often excessive and counterproductive and that they prevented people coming in with mini-firefighting units and mopping up smaller fires behind the fire front.<sup>61</sup> Chapter 2 in Volume II discusses the question of roadblocks.

## 6.3 CONCLUSIONS

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The Commission was impressed with the pre-planning and pre-positioning that ultimately contributed to successful suppression of the fire.

As a result of experience with a bushfire in the Grampians in 2006, Horsham Rural City Council had a representative at the Horsham Incident Control Centre. This arrangement meant that the Municipal Emergency Coordination Centre was not always set up in the event of an emergency because the Council's presence at the Horsham ICC might be sufficient to ensure that any operational requirements were met.<sup>62</sup>

On 7 February the Municipal Emergency Resource Officer, Mr Eltringham, worked out of the ICC. This appeared to be effective in improving coordination between the ICC and the Municipal Emergency Coordination Centre, although there were some communication and record-keeping problems with the operation of the MECC. Sergeant Ferrari attended the Horsham Police Operations Centre, where he performed the dual roles of Municipal Emergency Response Coordinator and police Forward Commander. Police liaison officers at the ICC kept the MERC informed of the Municipal Emergency Resource Officer's requests.<sup>63</sup>

Considerable difficulties were also experienced in radio communication between the Horsham ICC and some personnel at the fire ground. Mr McGennissen gave evidence that he was unable to raise the Horsham ICC, not just on his radio but also using multiple radios from other CFA vehicles.<sup>64</sup> Communications are discussed in Chapter 3 of Volume II.

The use of roadblocks at the time of the Horsham fire caused community concern. It appears the roadblocks were operated in accordance with the agreed CFA, DSE and Victoria Police guidelines as at 7 February. Strict enforcement of the guidelines was, however, a source of frustration and conflict between police and firefighters for several reasons:

- People who came to help their neighbours fight fires and individuals trying to return to their families were prevented from doing so.
- Private firefighting units and tankers were prevented from entering the fire ground.
- A maintenance crew responsible for the restoration of circuit breakers at the pumping station for the Horsham water supply was held up, delaying resumption of provision of Horsham's water and the refilling of CFA tankers.
- Some firefighters trying to return home at the end of their duty were denied access to their homes.<sup>65</sup>

Chapter 2 in Volume II discusses the question of roadblocks.

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- 1 Exhibit 282 – Statement of Eltringham, Attachment 1 (WIT.4003.001.0015) at 0029
  - 2 Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0058
  - 3 Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0087–0088
  - 4 Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0087–0088
  - 5 Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0087–0088
  - 6 Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0087–0088
  - 7 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [49]
  - 8 Exhibit 267 – Statement of Peterson (WIT.7516.001.0001\_R) [8]; Exhibit 258 – Statement of Power (WIT.7002.001.0001) [6], [17]
  - 9 Exhibit 11 – Statement of Esplin, Attachment 1 (WIT.005.001.0049) at 0081
  - 10 Exhibit 3 – Statement of Rees (WIT.004.001.0001) at 0098
  - 11 Exhibit 980 – Correspondence – Houses Destroyed – Breakdown by Fire (CORR.1003.0048\_R) at 0048\_R
  - 12 Exhibit 786 – Statement of Clow (WIT.3004.034.0004) [19.13]
  - 13 Exhibit 939 – Details Regarding Emergency Response (CFA.600.005.0195) at 0195, 0198; Exhibit 939 – Day by Day Breakdown – Horsham (DSE.HDD.0048.0545\_08); Exhibit 939 – Aircraft Data 0809 (DSE.HDD.0048.0544\_20) at 0544\_26
  - 14 Exhibit 994 – Vectis Fire – Fire Spread Map (CFA.600.006.0007)
  - 15 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [33]–[34]; Russell T7453:12–T7453:29
  - 16 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [34], [37], [45], [60], [66], Annexure 5 (WIT.3004.013.0214)
  - 17 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [46], [67]
  - 18 Exhibit 274 – Statement of Ferrari (WIT.3010.003.0317) [5]–[7]; Exhibit 282 – Statement of Eltringham (WIT.4003.001.0001) [2], [57]–[58]
  - 19 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [2], [60]
  - 20 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [34], [37], [45], [60], Annexure 5 (WIT.3004.013.0214)
  - 21 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [34], [37], [45], [60]–[61], Annexure 5 (WIT.3004.013.0214); Russell T7448:4–T7448:5, T7448:25–T7448:26
  - 22 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [34], [37], [45], [60], Annexure 5 (WIT.3004.013.0214)
  - 23 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [49], Annexure 11 (WIT.3004.013.0241) at 0247; Exhibit 282 – Statement of Eltringham (WIT.4003.001.0001) [16]; Russell T7310:1–T7310:4
  - 24 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [66]
  - 25 Exhibit 548 – Correspondence – Safety Advisors (CORR.0911.0107\_R)
  - 26 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [1]–[6], [58], [60], [66]
  - 27 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [66]–[67]; Russell T7454:21–T7454:28
  - 28 Exhibit 267 – Statement of Peterson (WIT.7516.001.0001\_R) [15], [18]; Exhibit 269 – Statement of Russell, Annexure 11 (WIT.3004.013.0241) at 0241
  - 29 Exhibit 267 – Statement of Peterson (WIT.7516.001.0001\_R) [8]; Exhibit 258 – Statement of Power (WIT.7002.001.0001) [6], [17]
  - 30 Exhibit 629 – SP AusNet Distribution BM Audit Report 2005 (DOC.ESV.003.0165) at 0172; Exhibit 258 – Statement of Power (WIT.7002.001.0001) [13]; Knop T7338:9–T7338:29; Power T7387:5–T7387:26
  - 31 Exhibit 258 – Statement of Power (WIT.7002.001.0001) [19]; Exhibit 257 – Statement of Knop, Annexure 46 (WIT.3020.002.0322) at 0324; Exhibit 266 – Statement of McDonald (WIT.7001.001.0001) [65], ‘Exhibit 3’ (WIT.7001.001.0047) at 0047–0048; McDonald T7426:31–T7427:21, T7430:19–T7430:23
  - 32 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [61], [63]; Russell T7448:2–T7448:5
  - 33 Exhibit 256 – Statement of Brennan (WIT.3019.001.0001) [16], Attachment 3 (WIT.3019.001.0019\_R) at 0025\_R, 0032\_R; Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [49], Annexure 11 (WIT.3004.013.0241) at 0244; McGenniken T7481:21–T7481:23
  - 34 Exhibit 256 – Statement of Brennan (WIT.3019.001.0001) [16], Attachment 3 (WIT.3019.001.0019\_R) at 0032\_R; Russell T7311:12–T7311:18, T7316:1–T7316:5
  - 35 Exhibit 256 – Statement of Brennan (WIT.3019.001.0001) [16], Attachment 3 (WIT.3019.001.0019\_R) at 0032\_R
  - 36 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [55], Annexure 10 (WIT.3004.013.0239); Exhibit 255 – Star Tool – Horsham Fire (EXH.255.0001); Exhibit 4 – Supplementary Statement of Rees (WIT.004.002.0001) [43]; Russell T7315:19–T7315:31
  - 37 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [104], Annexure 15 (WIT.3004.013.0280); Russell T7456:4–T7456:6
  - 38 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [106]–[108], Annexure 16 (WIT.3004.013.0282), Annexure 17 (WIT.3004.013.0285), Annexure 18 (WIT.3004.013.0287), Annexure 19 (WIT.3004.013.0289), Annexure 20 (WIT.3004.013.0291); Exhibit 4 – Statement of Rees (WIT.004.002.0001) [50]; Submissions of Counsel Assisting – Horsham Fire (SUBM.202.005.0001) [6.7]; Russell T7456:4–T7456:8, T7456:17–T7456:27
  - 39 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [73], [100]; Exhibit 272 – Statement of McGenniken (WIT.089.001.0001\_R) [11], [53]–[58]
  - 40 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [75]

- 41 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [77]; Exhibit 267 – Statement of Peterson (WIT.7516.001.0001\_R) [23]
- 42 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [64], [78], [106], Annexure 16 (WIT.3004.013.0282), Annexure 17 (WIT.3004.013.0285), Annexure 18 (WIT.3004.013.0287), Annexure 19 (WIT.3004.013.0289), Annexure 20 (WIT.3004.013.0291); Exhibit 4 – Supplementary Statement of Rees (WIT.004.002.0001) [45]; Russell T7456:4–T7456:8, T7456:17–T7456:27
- 43 Exhibit 273 – Statement of Arthur (WIT.3010.004.0483) [74]; Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [80]
- 44 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [64], [78], Annexure 11 (WIT.3004.013.0241) at 0244; Exhibit 4 – Statement of Rees (WIT.004.002.0001) at 0008
- 45 Exhibit 282 – Statement of Eltringham (WIT.4003.001.0001) [66]
- 46 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [85]
- 47 Exhibit 256 – Statement of Brennan (WIT.3019.001.0001) [20]; Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [55]; Brennan T7317:16–T7317:18, T7320:6–T7320:10; Coulthard T7468:1–T7468:11, T7468:25–T7469:10; Russell T7311:7–T7311:11, T7311:29–T7312:5, T7312:16–T7312:21, T7313:17–T7313:20, T7315:2–T7315:5
- 48 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [55]
- 49 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [109], Annexure 20 (WIT.3004.013.0291)
- 50 Exhibit 79 – Transcript – ABC Western Victoria (CFA.001.015.0310) at 0336–0342; Exhibit 79 – Transcript – ABC Western Victoria (CFA.001.015.0347) at 0378–0380; Exhibit 79 – Transcript – ABC Western Victoria (CFA.001.015.0382) at 0393–0403
- 51 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [55], [97]–[98], Annexure 11 (WIT.3004.013.0241) at 0244–0245, 0248; Exhibit 4 – Supplementary Statement of Rees (WIT.004.002.0001) at 0008; Exhibit 271 – Statement of Coulthard (WIT.088.001.0001\_R) [31]; McGennissen T7482:2–T7482:10; Russell T7311:29–T7312:3, T7314:23–T7314:31, T7457:15–T7457:18
- 52 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [110]; Exhibit 191 – Statement of Graystone, Annexure 5 (WIT.3026.001.0094) at 0120
- 53 Exhibit 7 – Transcript – 774 ABC Radio (SUMM.001.002.0001) at 0423, 0430
- 54 Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [95]
- 55 Exhibit 282 – Statement of Eltringham (WIT.4003.001.0001) [69]–[70]; Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [55], [97]–[98], Annexure 11 (WIT.3004.013.0241) at 0244–0245, 0248; Exhibit 4 – Supplementary Statement of Rees (WIT.004.002.0001) at 0008; Exhibit 271 – Statement of Coulthard (WIT.088.001.0001\_R) [31]; McGennissen T7482:2–T7482:10; Russell T7311:29–T7312:3, T7314:23–T7314:31, T7457:15–T7457:18
- 56 Exhibit 256 – Statement of Brennan, Attachment 3 (WIT.3019.001.0019\_R) at 0025\_R; Russell T7313:20–T7313:25
- 57 Exhibit 272 – Statement of McGennissen (WIT.089.001.0001\_R) [17], [19], [21]–[22]; Russell T7451:16–T7453:13, T7454:15–T7454:20
- 58 Exhibit 256 – Statement of Brennan, Attachment 3 (WIT.3019.001.0019\_R) at 0025\_R; Exhibit 269 – Statement of Russell (WIT.3004.013.0001) [50]–[51], Annexure 9 (WIT.3004.013.0236); Exhibit 282 – Statement of Eltringham (WIT.4003.001.0001) [75]; Exhibit 786 – Statement of Clow (WIT.3004.034.0004) [19, 13]; Exhibit 980 – Correspondence – Houses Destroyed – Breakdown by Fire (CORR.1003.0048\_R) at 0048\_R
- 59 Exhibit 271 – Statement of Coulthard (WIT.088.001.0001\_R) [18]–[19], [23]; McGennissen T7492:20–T7493:4; Russell T7462:22–T7463:3; Coulthard T7469:11–T7470:6, T7470:29–T7471:9, T7475:8–T7475:31
- 60 McGennissen T7491:3–T7491:7
- 61 Exhibit 275 – Statement of Salter (WIT.3010.004.0726\_M) [35]
- 62 Exhibit 282 – Statement of Eltringham (WIT.4003.001.0001) [27]–[29], [33]
- 63 Exhibit 275 – Statement of Salter (WIT.3010.004.0726\_M) [13], [24]; Exhibit 282 – Statement of Eltringham (WIT.4003.001.0001) [61]–[62], [64]; Exhibit 274 – Statement of Ferrari (WIT.3010.003.0317) [12], [14]–[15], [20]
- 64 Exhibit 272 – Statement of McGennissen (WIT.089.001.0001\_R) [53]; McGennissen T7491:15–T7492:3; Russell T7461:5–T7461:17
- 65 Exhibit 272 – Statement of McGennissen (WIT.089.001.0001\_R) [37], [39], [41]–[45]; McGennissen T7485:3–T7485:16, T7485:24–T7487:31, T7489:1–T7489:29