THE COLERAINE FIRE

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Coleraine is in Southern Grampians Shire in Western Victoria. The town is about 35 kilometres west of Hamilton and 350 kilometres west of Melbourne.

At about 12:30 on 7 February 2009 fire broke out in a paddock on private farmland about 5 kilometres west-northwest of the township. The grass fire travelled rapidly, and at one point fears were held for the township. The fire was contained at 17:30. It had burnt 713 hectares and destroyed one house, farm infrastructure, fencing and the Coleraine Avenue of Honour, which was bordered by cypresses. Figure 7.1 shows the extent of the fire.

OVERVIEW

Maximum temperature	The maximum temperatures recorded were 43°C at Hamilton automatic weather station at 13:00 and 42.1°C at Casterton AWS at 12:00.1
Minimum relative humidity	The minimum relative humidity recorded was 8.9 per cent at Hamilton AWS at 13:30 and 8.9 per cent at Casterton AWS at 12:00. ²
Wind	The maximum winds recorded before the wind change were north-westerly at 40 kilometres an hour at Casterton AWS at 11:00. ³
	The wind change came through at about 12:55.4
	The maximum winds recorded after the wind change were westerly at 40 kilometres an hour at Casterton AWS at 13:35.⁵
Fire danger index	The maximum Grassland Fire Danger Index was over 100 at both Hamilton AWS and Casterton AWS. $^{\rm 6}$
Cause	Electrical failure. ⁷
Fatalities	No fatalities. ⁸
Casualties	One casualty. ⁹
Houses destroyed	One house. ¹⁰
Overall area burnt	713 hectares. ¹¹
Firefighting resources	On 7 February, 279 CFA and 64 NEO personnel attended the fire. They were supported by 55 CFA appliances, 6 NEO appliances and 3 aircraft. ¹²

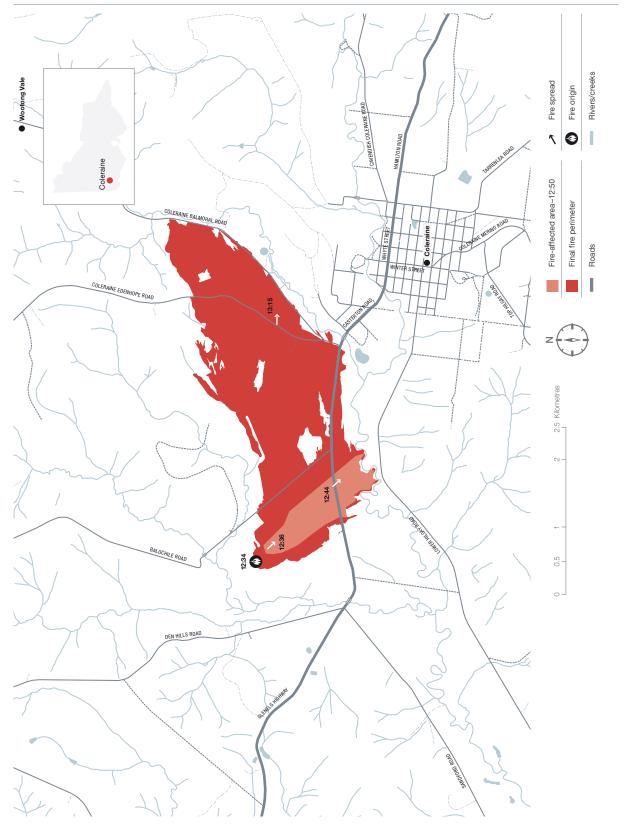
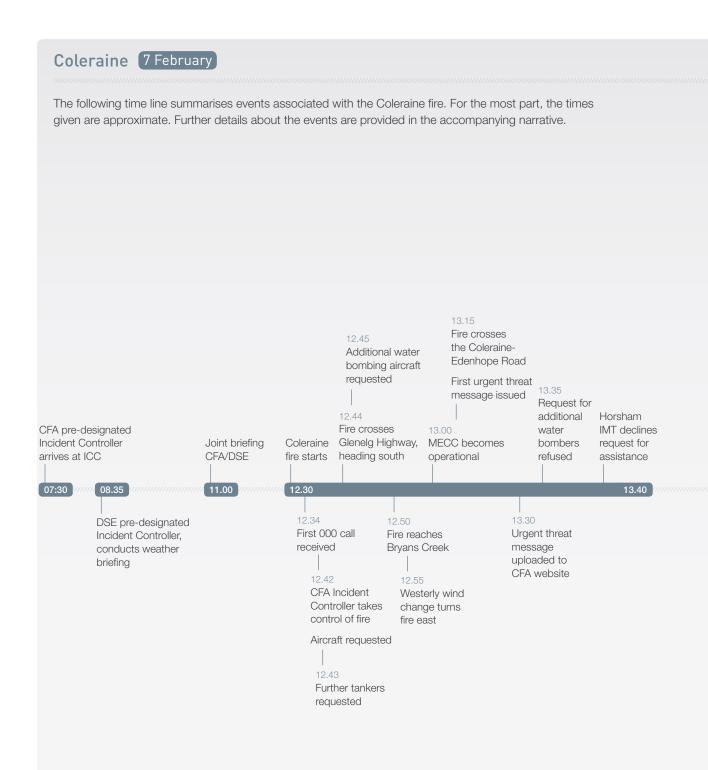


Figure 7.1 The Coleraine fire

Source: Exhibit 994 – Coleraine Fire – Fire Spread Map.¹³





7.1 SEQUENCE OF EVENTS

7.1.1 PREPARATION

In the light of the weather forecasts for 7 February, fire and emergency agencies prepared specifically for extreme weather with a high fire risk. The Country Fire Authority and the Department of Sustainability and Environment in Region 4 pre-established a joint incident management team to enable a 'hot start' from 07:30 on 7 February. Mr William Speirs, a CFA level 3 Incident Controller, was rostered for that role; Mr Andrew Morrow, also a level 3 Incident Controller, was the rostered DSE Incident Controller.¹⁴

The CFA and DSE have a long history of working together in the region. All incident management teams are joint teams and have practised and worked together many times. Mr Speirs described the working relationship as 'extremely good'.¹⁵

As well as establishing and resourcing incident management teams, the CFA, DSE and local councils placed resources—among them firefighters, two fixed-wing water bombers positioned at Casterton, bulldozers, and contractors with other heavy machinery and water tankers—on standby. Some local brigades also placed crews on standby at their stations.¹⁶

Victoria Police rostered on extra members and ascertained the status of other members, so that they could be called on in the event of a protracted incident. In addition, Southern Grampians Shire Council prepared the Municipal Emergency Coordination Centre for activation.¹⁷

Table 7.1 summarises the state of preparedness for the Coleraine fires.

Pre-designated level 3 ICC	Yes ¹⁸
Pre-formed IMT at ICC	Yes ¹⁹
Pre-identified level 3 IC	Yes ²⁰
Pre-identified IMT members	Yes ²¹
Time fire started	Between 12:15 to 12:3022
Time full IMT in place	07:30, 7 February 2009 ²³
Safety adviser appointed	No ²⁴

Table 7.1 The Coleraine fire – IMT preparedness

7.1.2 7 FEBRUARY

There are four possible recognised level 3 incident control centres in the Coleraine area. On 7 February the ICC was at Heywood, about 70 kilometres south of Coleraine. Mr Speirs arrived there at 07:30.²⁵

About an hour later Mr Morrow conducted a briefing, outlining the weather forecast for the day and providing details of a fire at Penola, just over the Victoria – South Australia border. He spoke of the resources available in the region, among them the two water bombers at Casterton, but said he thought the likelihood of support from elsewhere in the state was low.²⁶

Later that morning, at 11:00, Mr Morrow and Mr Speirs held a joint briefing. Mr Speirs said the high winds and rising temperature forecast for the day would limit aircraft movement.²⁷

On the morning of 7 February the weather was relatively calm. One fire, caused by lightning, was reported early in the day, near the Victoria – South Australia border. This fire was quickly extinguished.²⁸

Origin and cause

At about 12:30 a fire started in a paddock on private farmland about 5 kilometres west-north-west of Coleraine.²⁹

A single-wire earth return, or SWER, electricity line suspended by six power poles ran across the property. The fire started after the tie wire that held the conductor in place on the top of pole 3 broke, allowing the conductor to fall from the pole. The tie wire could have been the original, installed in 1961 or 1962. It appears to have broken as a result of fatigue and corrosion and had already had one break in it before 7 February. That break probably occurred after Powercor, the operator of the line, had last inspected the line, in September 2004, in accordance with its asset inspection policy.³⁰

The conductor remained suspended between poles 2 and 4. It swung in the wind, repeatedly striking the side of pole 3. It also repeatedly hit the branches of a nearby tree. The contact between the conductor and both the pole and the tree presented two possible points of ignition. The State of Victoria submitted to the Commission that the contact between the conductor and the pole was the cause of the fire, but the Commission is of the view that the more probable cause was contact with the tree, causing arcing that ignited foliage near the top of the tree, which subsequently fell to the ground. The point of origin of the resultant fire was the base of the tree. There could also have been a second point of ignition at the base of pole 3, caused by contact between the conductor and the pole. Powercor supported this view.³¹

The limitations of the electrical protection systems that can be installed on a SWER network contributed to the start of the Coleraine fire. The protection devices on a SWER line are often unable to distinguish between the current that flows to earth when a SWER conductor hits a tree or power pole and the current that flows to earth as part of the ordinary operation of a SWER system. The result is that the conductor remained energised despite its repeat arcing against the tree and power pole, increasing the opportunity for the arcing to start the fire. The risk of ignition of this kind is a feature of SWER lines.³²

The age of electrical assets and the limitations of SWER lines are discussed in Chapter 4 of Volume II.

Fire run, response and management

From the point of origin the fire travelled to the south-east, through grain-crop stubble and undulating grassland towards the valley country. At first it ran up a hill from the paddock in which it started. Then, influenced by the wind, it travelled downhill towards the Glenelg Highway and Bryans Creek.³³

The CFA received the first call about the Coleraine fire at 12:34; the caller was a person who lived about a kilometre west of the point of the fire's origin. Five tankers responded initially. At about 12:42 Mr Speirs was alerted to the fire. Because the fire had started on private land, the CFA was the control agency and Mr Spiers became the Incident Controller.³⁴

At 12:42 water-bombing aircraft were requested. The fixed-wing water bombers, working out of Casterton, dropped four loads on the fire before being obliged to move to Hamilton because of poor flying conditions. From there they dropped a further two loads. Another eight tankers were requested from the fire ground at 12:43.³⁵

The fire moved rapidly, covering the kilometre from the point of origin to the Glenelg Highway in about eight minutes. At about 12:44 it crossed the highway, heading south and reaching Bryans Creek at 12:50.³⁶

Shortly after 12:45 the Municipal Emergency Resource Officer for Southern Grampians Shire Council, Mr Lyle Tune, and the Municipal Emergency Response Coordinator, Senior Sergeant Nick Finnegan, received reports that a fire had started near Coleraine. Senior Sergeant Finnegan contacted Mr Tune shortly before 13:00 and asked that the Municipal Emergency Coordination Centre be activated. The MECC was operational shortly after 13:00. There was concern that the forecast wind change would push the fire into the town.³⁷

A westerly wind change reached the fire ground at about 12:55, turning the fire to the east and taking the path of the fire north of Coleraine. The eastern flank of the fire became the fire front. At 12:57 Mr Speirs and Mr Morrow discussed Mr Speirs' intention to divert two additional strike teams to protect the town. Throughout the afternoon a steady stream of CFA, DSE and private resources were devoted to the fire.³⁸

The first urgent threat message was issued at 13:15. It warned that the communities of Muntham, Coleraine and Hilgay might be directly affected by the fire. The message was uploaded to the CFA website at 13:30. After the fire crossed the Coleraine–Balmoral road a further urgent threat message was issued, at 13:41. Additional urgent threat messages and then message downgrades were also successfully released.³⁹

The fire crossed the Coleraine–Edenhope road at 13:15, heading east along a creek line. By 13:37 it had covered about 200 hectares and was bearing towards steep valley country. There was concern that if it reached the valleys it would split into fingers and become more difficult to control. At 13:35 Mr Speirs was informed by the logistics officer that additional water bombers were unavailable because of the Horsham fire, and at 13:40 the Horsham ICC declined a request for additional tankers from the Coleraine ICC for this reason.⁴⁰

By 14:14 about 40 tankers were present. Mr Speirs had asked for another strike team and had told the Regional Emergency Coordination Centre that more resources might be needed.⁴¹

A relief centre was established at about 14:15 in Coleraine to cater for people who wanted to evacuate their residences. No-one attended the centre, and it was closed at about 17:05.⁴²

The fire continued its run towards the valley country, coming within about a kilometre of Coleraine. At 14:32, however, a west-south-westerly wind change turned the fire in a more northerly direction, away from Coleraine.⁴³

The fire ran to the north-east until its forward spread was halted at 15:02. It remained active around the edges until 17:30, when it was reported as contained on the western side of the Coleraine–Balmoral road. From the time the forward spread of the fire was halted crews worked blacking out the fire. The final perimeter of the fire was about 16 kilometres.⁴⁴

Mr Speirs told the Commission he had not expected the head of the fire to be stopped so soon and that this was as a result of firefighters working to 'pull the fire up' in steep country. He described the firefighters' work as 'nothing short of fantastic'.⁴⁵

The Municipal Emergency Coordination Centre received only a few requests for assistance, and there was no need to seek resources from other municipalities. During the day Mr Tune arranged for earth-moving equipment and personnel and for a community bus to be placed on standby to assist with transportation of the elderly if necessary. The MECC closed at 17:52 and went into 'recovery mode'.⁴⁶

A final advice message was issued at 18:07, saying the fire had been contained. This message was broadcast on ABC Western Victoria at 18:10.⁴⁷

At about 20:00 a community update newsletter was prepared, and CFA Community Safety personnel hand-delivered copies to people living in and around the fire-affected area. The newsletter detailed the fire's impact, the losses and ongoing suppression work, and provided recovery information.⁴⁸

The Coleraine fire was particularly fast-running: the forward rate of spread peaked at as much as 9 kilometres an hour, although generally it was much less than this. The fire largely burnt in paddocks where fuel loads were low, and the flame heights were minimal. Along roadsides, where fuel loads were greater, flame heights were 2 to 3 metres. The efforts of firefighters and local property owners, and the two wind changes, prevented the fire from reaching Coleraine and limited the forward spread in less than three hours.⁴⁹

During the entire course of the fire the IMT for the Coleraine fire planned for the predicted path of the fire, managed resources, issued warnings, provided communications support for radio black spots, and directed the establishment of roadblocks.⁵⁰

The Coleraine Incident Management Team also issued a number of statements, warnings and messages during the day. In addition, Mr Speirs spoke to 774 ABC radio and local ABC radio to convey messages. As well as the warnings being issued, police attended properties throughout the fire zone, advising residents to implement their fire plans.⁵¹

112 It appears that the integrated Emergency Coordination Centre did not post all threat messages on the CFA website. As a consequence, several radio updates, including those issued by 774 ABC radio, referred to out-of-date information.⁵² Late on 7 February the Incident Controller instructed that the roadblocks that had been erected earlier in the day were to stay in place overnight. There were, however, reports of traffic travelling along three of the roads that had been closed. The last roadblock was removed at 09:30 on 8 February.⁵³

In comparison with some other fires on 7 February, the Coleraine fire had a relatively small impact. Nevertheless, as noted, it did destroy one house, farm infrastructure, fencing and the cypress-lined Coleraine Avenue of Honour. A local resident sustained burns when trying to move stock from the path of the fire.⁵⁴

In all, 44 CFA brigades attended the fire, with 54 appliances and 274 personnel. DSE personnel, private firefighters, forest industry brigades and fixed-wing water bombers also contributed.⁵⁵

A large number of farmers and landowners in the area keep private firefighting appliances to defend their properties and help fight fires. These private resources made a valuable contribution to the firefighting effort on 7 February. They are often the first resources involved in an attack on a fire in the Western District.⁵⁶

7.2 CONCLUSIONS

Although throughout the day Mr Speirs had contact with personnel in the Coleraine Incident Management Team, the Regional Emergency Coordination Centre and divisional and sector commanders, he was not aware that predictive and situational maps for the fire had been prepared in the RECC on 7 February. The IMT carried out its own prediction and analysis, however, and was not hindered by the lack of consultation with and support from the RECC.⁵⁷

The overall local effort—including the advance planning, the efficient response to the fire, and the rapid deployment of resources (among them the water bombers)—and the favourable wind change resulted in the fire's run being stopped reasonably quickly, and there was only limited damage. The Commission was impressed and commends the cooperative approach on the part of both the CFA and DSE in the region: it has developed into a good working relationship. This led to improved incident and emergency planning and was reflected in the effective response.

The warnings the Coleraine Incident Control Centre issued for the Coleraine fire were generally timely and accurate.

Because the Coleraine fire was contained about five hours after it began, it did not require the same level of municipal resources as other fires that occurred on 7 February.

The roadblocks appear to have been operated in accordance with the guidelines agreed by the CFA, DSE and Victoria Police, but strict enforcement of the guidelines became a source of frustration between police and firefighters for two main reasons:

- Some people in private firefighting appliances or CFA personnel in private vehicles were prevented from attending the fire ground.
- A truck that was transporting fire retardant to Hamilton airport was delayed until approval from the Incident Controller was received, delaying the fire retardant's arrival at the airport.⁵⁸

Chapter 2 in Volume II looks at the question of roadblocks.

- 1 Exhibit 277 Statement of Speirs, Annexure 7 (WIT.3004.014.0048) at 0049; Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [64]
- 2 Exhibit 277 Statement of Speirs, Annexure 7 (WIT.3004.014.0048) at 0049; Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [64]
- 3 Exhibit 277 Statement of Speirs, Annexure 7 (WIT.3004.014.0048) at 0052
- 4 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [35]
- 5 Exhibit 277 Statement of Speirs, Annexure 7 (WIT.3004.014.0048) at 0052
- 6 Exhibit 277 Statement of Speirs, Annexure 7 (WIT.3004.014.0048) at 0051; Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [64]. Note that whilst the evidence refers only to the Fire Danger Index, given the topography of the Coleraine area, it is likely that this was measured using the Grass Fire Danger Index
- 7 Submissions of the State of Victoria Coleraine Fire (RESP.3000.005.0011) [8]–[11]; Exhibit 257 Statement of Knop, Annexure 34 (WIT.3020.002.0272) at 0273–0274; Exhibit 280 Statement of Power (WIT.7002.002.0001) [25]
- 8 Exhibit 3 Statement of Rees (WIT.004.001.0001) at 0100
- 9 Exhibit 289 Statement of Nagorcka, Annexure 1 (WIT.3004.012.0007_R) at 0011_R; Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [143]
- 10 Exhibit 980 Correspondence Houses Destroyed Breakdown by Fire (CORR.1003.0048_R) at 0048_R
- 11 Exhibit 786 Statement of Clow (WIT.3004.034.0004) [19]
- 12 Exhibit 939 Details Regarding Emergency Response (CFA.600.005.0195) at 0195, 0198; Exhibit 939 Day by Day Breakdown Coleraine (DSE.HDD.0048.0545_09); Exhibit 939 Aircraft Data 0809 (DSE.HDD.0048.0544_20) at 0544_26
- 13 Exhibit 994 Coleraine Fire Fire Spread Map (CFA.600.006.0011)
- 14 Exhibit 277 Statement of Speirs, Annexure 3 (WIT.3004.014.0038); Speirs T7525:4–T7525:8
- 15 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [44]; Speirs T7520:15-T7520:18, T7523:19-T7523:30, T7524:11-T7524:17
- 16 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [29], [47], [51]
- 17 Exhibit 284 Statement of Finnegan, Attachment 20 (WIT.3010.003.0403) at 0404; Exhibit 285 Statement of Tune (WIT.4005.001.0001) [40]
- 18 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [14(a)], [23]
- 19 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [43]
- 20 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [45]
- 21 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [24], [43]; Speirs T7525:4–T7525:10, T7528:21–T7528:28
- 22 Exhibit 279 Statement of Cooper (WIT.7508.001.0001_R) [14]–[18]; Cooper T7534:7–T7534:27
- 23 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [43]
- 24 Exhibit 548 Correspondence Safety Advisors (CORR.0911.0107_R)
- 25 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [43], [45]
- 26 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [47], [76]
- 27 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [53]–[54]
- 28 Speirs T7525:11-T7525:15
- 29 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [31], [32], Annexure 7 (WIT.3004.014.0048) at 0048; Exhibit 279 Statement of Cooper (WIT.7508.001.0001_R) [14]; Exhibit 289 Statement of Nagorcka (WIT.3004.012.0001) [16]
- Exhibit 279 Statement of Cooper (WIT.7508.001.0001_R) [2]–[3]; Cooper T7532:5–T7532:10; Exhibit 281 Tie Wire (EXH.281.0001); Exhibit 289 Statement of Nagorcka (WIT.3004.012.0001) [17], Annexure 1 (WIT.3004.012.0007_R) at 0014_R; Exhibit 257 Statement of Knop (WIT.3020.002.0133_R) [18(c)], [29], [45]; Exhibit 539 Statement of Gates (WIT.123.001.0001_R) [17]; Exhibit 280 Statement of Power (WIT.7002.002.0001) [9]–[10], [12]; Power T7581:7–T7581:12, T7595:14–T7595:22, T12706:5–T12706:9; Knop T7572:3–T7572:5
- 31 Submissions of the State of Victoria Coleraine Fire (RESP.3000.005.0011) [8]–[11]; Exhibit 257 Statement of Knop, Annexure 34 (WIT.3020.002.0272) at 0273–0274; Exhibit 280 Statement of Power (WIT.7002.002.0001) [25]
- 32 Exhibit 280 Statement of Power (WIT.7002.002.0001) [26]; Exhibit 266 Statement of McDonald (WIT.7001.001.0001) [66]; McDonald T7600:7–T7600:17, T7601:12–T7602:1, T7607:24–T7608:9
- 33 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [31]–[33], Annexure 7 (WIT.3004.014.0048) at 0048–0049; Exhibit 289 Statement of Nagorcka, Annexure 1 (WIT.3004.012.0007_R) at 0013_R; Exhibit 278 Star Tool Coleraine Fire (EXH.278.0001)
- 34 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [32], [49], [61], Annexure 7 (WIT.3004.014.0048) at 0048; Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [54]; Speirs T7517:10–T7517:11
- 35 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [62]–[63], [66], [88]; Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [54]–[55]; Speirs T7521:26–T7522:2, T7525:20–T7525:21
- 36 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [34]
- 37 Exhibit 285 Statement of Tune (WIT.4005.001.0001) [44], [46]–[47]; Exhibit 284 Statement of Finnegan (WIT.3010.003.0324) [35], Annexure 17 (WIT.3010.003.0383) at 0383; Exhibit 4 Statement of Rees (WIT.004.002.0001) [62]
- 114
 38 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [35], [75], [79], Annexure 7 (WIT.3004.014.0048) at 0053; Speirs T7521:6–T7521:17; T7525:16–T7525:22

- 39 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [94]–[96], [116], Annexure 13 (WIT.3004.014.0174), Annexure 14 (WIT.3004.014.0177), Annexure 15 (WIT.3004.014.0180), Annexure 16 (WIT.3004.014.0184), (WIT.3004.014.0185), (WIT.3004.014.0187), (WIT.3004.014.0189), Annexure 17 (WIT.3004.014.0193), Annexure 19 (WIT.3004.014.0198), Annexure 20 (WIT.3004.014.0201), (WIT.3004.014.0203)
- 40 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [36], [111], [113]; Exhibit 269 Statement of Russell (WIT.3004.013.0001) [75]
- 41 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [124]
- 42 Exhibit 285 Statement of Tune (WIT.4005.001.0001) [54]; Exhibit 284 Statement of Finnegan (WIT.3010.003.0324) [45], Annexure 17 (WIT.3010.003.0383) at 0384–0386; Exhibit 283 Statement of New (WIT.3010.004.0062) [37]
- 43 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [131], Annexure 6 (WIT.3004.014.0046)
- 44 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [39]–[40], [136], [153], [162], Annexure 7 (WIT.3004.014.0046); Speirs T7519:25–T7519:28
- 45 Speirs T7519:21-T7519:30
- 46 Exhibit 285 Statement of Tune (WIT.4005.001.0001) [53], [55]; Exhibit 284 Statement of Finnegan (WIT.3010.003.0324) [45]–[46], Annexure 17 (WIT.3010.003.0383) at 0383–0384, 0386; Exhibit 283 – Statement of New (WIT.3010.004.0062) [50]
- 47 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [161], Annexure 20 (WIT.3004.014.0200) at 0200–0201; Exhibit 79 – Transcript – ABC Western Victoria (CFA.001.015.0413) at 0416–0417
- 48 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [163], Annexure 22 (WIT.3004.014.0209)
- 49 Exhibit 277 Statement of Speirs, Annexure 7 (WIT.3004.014.0048) at 0051; Exhibit 257 Statement of Knop, Annexure 33 (WIT.3020.002.0266) at 0266; Speirs T7519:21–T7519:30, T7520:18–T7520:22
- 50 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [57]–[160]
- 51 Exhibit 283 Statement of New (WIT.3010.004.0062) [43]; Speirs T7525:26–T7525:30
- 52 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [120], [130], [148], Annexure 19 (WIT.3004.014.0198); Exhibit 7 Transcript 774 ABC Radio (SUMM.001.002.0001) at 0253–0254, 0320, 0332, 0344, 0364, 0368, 0381, 0400; Exhibit 79 – Transcript – ABC Western Victoria (CFA.001.015.0347) at 0347
- 53 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [153]–[156], [169]
- 54 Exhibit 283 Statement of New (WIT.3010.004.0062) [41]; Exhibit 289 Statement of Nagorcka, Annexure 1 (WIT.3004.012.0007_R) at 0011_R; Exhibit 277 – Statement of Speirs (WIT.3004.014.0001) [41], [143], [146]
- 55 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [22]; Speirs T7521:26–T7522:2, T7523:7–T7523:18; Exhibit 4 – Supplementary Statement of Rees (WIT.004.002.0001) [64]
- 56 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [20]; Speirs T7522:13–T7522:30; Exhibit 286 Statement of Wall (WIT.7509.001.0001_R) [15]–[24]; Exhibit 287 Statement of Fitzgerald (WIT.7510.001.0001_R) [21]–[26]
- 57 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [165]–[167]; Speirs T7518:6–T7518:23, T7519:2–T7519:13
- 58 Exhibit 277 Statement of Speirs (WIT.3004.014.0001) [169]; Exhibit 283 Statement of New (WIT.3010.004.0062) [51]–[52]; Exhibit 284 Statement of Finnegan (WIT.3010.003.0324) [38]

