



THE NARRE WARREN AND  
UPPER FERNTREE GULLY FIRES

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# 12 THE NARRE WARREN AND UPPER FERNTREE GULLY FIRES

On 7 February 2009 a number of small fires burned at the rural–urban interface in Melbourne’s south-east; among them were three fires in Narre Warren (one at Harkaway and two at Lynbrook) and one in Upper Ferntree Gully. The fires burned in grass reserves and scrubland, on residential streets, and in homes and gardens.

Each of the fires might have resulted in far greater and more widespread destruction than eventuated. In particular, the Harkaway and Upper Ferntree Gully fires could have caused severe damage, the latter having had the potential to run into the Dandenong Ranges. In total, seven houses were destroyed.

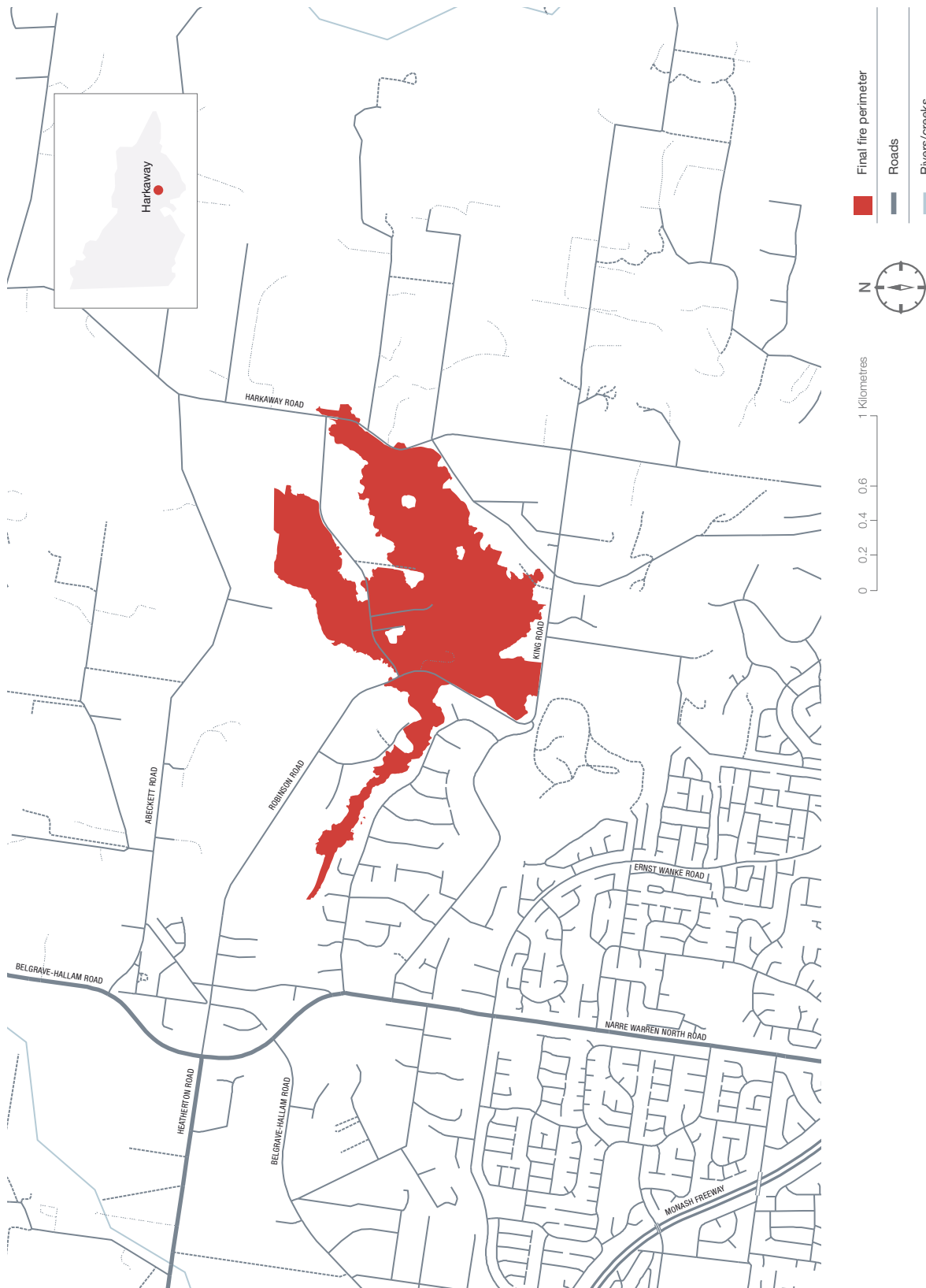
Figures 12.1, 12.2 and 12.3 show the extent of the fires.

**Image 12.1**



Source: Courtesy of the *Herald & Weekly Times*.

Figure 12.1 The Harkaway fire



Source: Exhibit 994 – Harkaway Fire – Final Fire Perimeter.<sup>1</sup>



Figure 12.2 The Lynbrook—Coral Drive fire

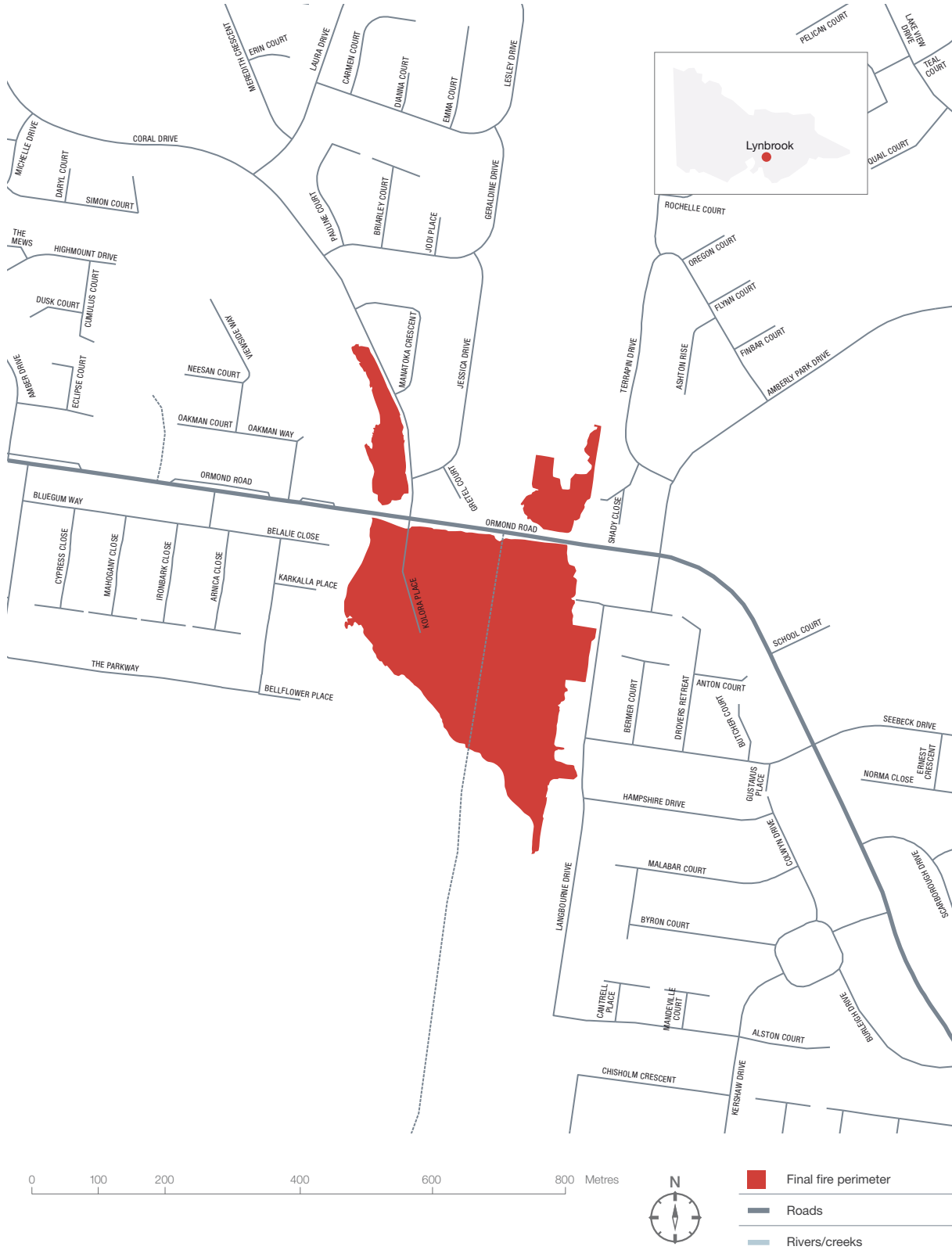


Figure 12.3 The Upper Ferntree Gully fire

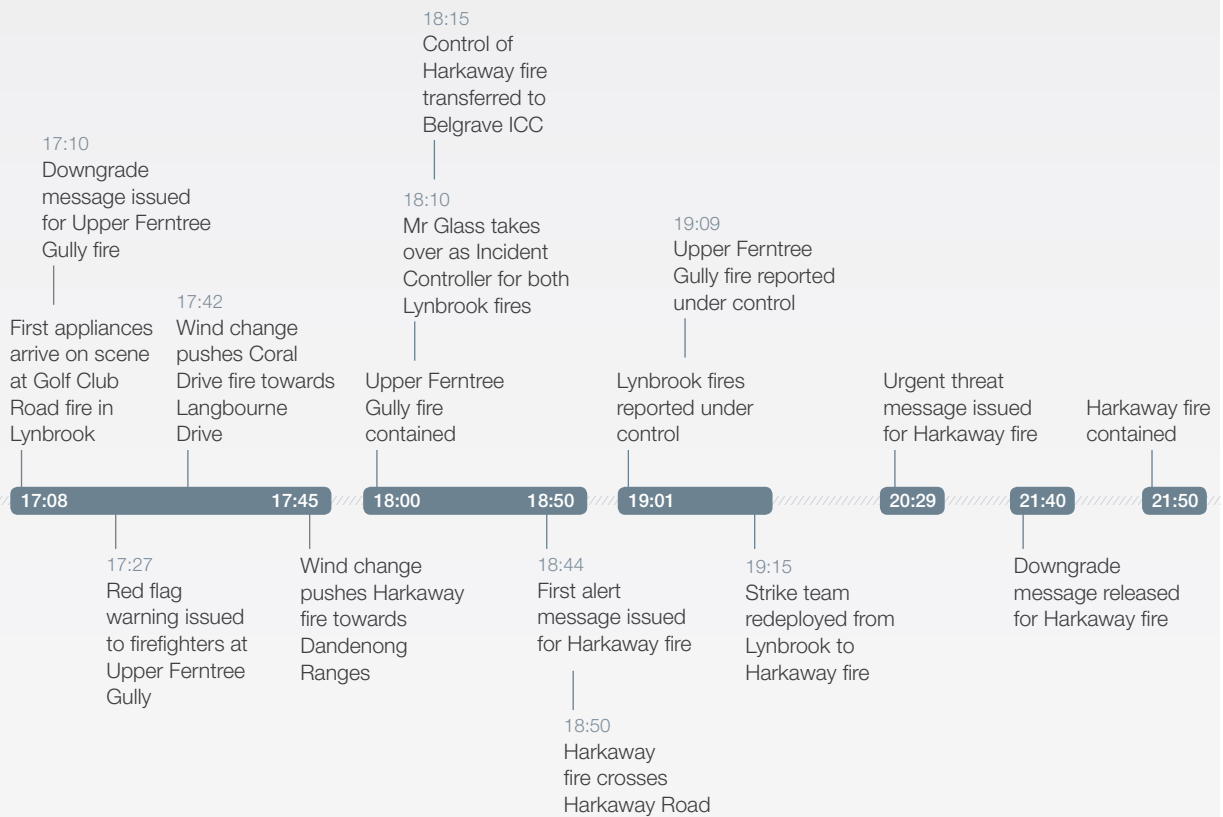


Source: Exhibit 994 – Upper Ferntree Gully Fire – Final Fire Perimeter.<sup>3</sup>

## Narre Warren and Upper Ferntree Gully 7 February

The following time line summarises events associated with the Narre Warren and Upper Ferntree Gully fires. For the most part, the times given are approximate. Further details about the events are provided in the accompanying narrative.





## 12.1 NARRE WARREN

### OVERVIEW

|                               |                                                                                                                                                                                    |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Cause</b>                  | Harkaway: accidental. <sup>4</sup><br>Lynbrook: not determined. <sup>5</sup>                                                                                                       |
| <b>Fatalities</b>             | No fatalities. <sup>6</sup>                                                                                                                                                        |
| <b>Houses destroyed</b>       | Seven houses. <sup>7</sup>                                                                                                                                                         |
| <b>Overall area burnt</b>     | Harkaway: 147 hectares. <sup>8</sup><br>Lynbrook: 12 hectares. <sup>9</sup>                                                                                                        |
| <b>Firefighting resources</b> | On 7 February, 294 CFA, 16 MFB and 12 NEO personnel attended the fires. They were supported by 63 CFA appliances, 4 MFB appliances, 7 NEO appliances and 2 aircraft. <sup>10</sup> |

#### 12.1.1 SEQUENCE OF EVENTS

##### Preparation

In the lead-up to 7 February, Country Fire Authority brigades in Region 8 attended other incidents, including the Delburn fires, and planning and preparations were advanced in anticipation of fire escaping Bunyip State Park.<sup>11</sup> This meant that some brigades were already fatigued before 7 February.

Mr Trevor Owen, Region 8 CFA Operations Manager, prepared level 3 incident control centres at Pakenham and Moorooduc, and incident management teams were in position on the morning of 7 February. At that time Mr Owen supervised the move of MFB appliances to Dandenong, Springvale, Hallam, Frankston and Patterson River; this released CFA resources in those stations to respond to the Bunyip fire. Later in the day some of the MFB crews responded to fires in Narre Warren.<sup>12</sup>

From 08:00 on 7 February the Regional Emergency Coordination Centre was running at full capacity.<sup>13</sup>

##### The Harkaway fire

The fire at Harkaway began at about 11:32 at a home in Garden View Court. It is suspected the fire was caused by someone using an angle grinder: Victoria Police has charged a man with using a power tool in breach of regulations on a total fire ban day.<sup>14</sup>

The Narre Warren North tanker was the first to arrive at the Harkaway fire, arriving at 11:37. A number of CFA appliances subsequently attended, including brigades from Dandenong and Hallam. The fire was initially managed by the Narre Warren North CFA Brigade at the local level. The Incident Controller was Mr Shaun Trotter, captain of Narre Warren North Brigade. Both the Moorooduc and Belgrave Incident Control Centres monitored the fire during the early part of its run.<sup>15</sup>

The fire initially ran to the south-east. It was contained at 11:41 and stopped at 12:23. At 15:32, however, the fire re-ignited on the Robinsons Road side of Crawley Road when a resident cut down a smoking branch, causing burning embers to hit dry fuel on the ground. Once re-ignited, the fire ran towards the south-east under the influence of strong north-westerly winds, crossing Robinsons Road. The fire was again attended by local CFA brigades. Shortly after, additional resources were sought, including from Upper Beaconsfield, Berwick and Cranbourne. Crews worked quickly, and at 16:05 air support was requested. Initially, the Regional Emergency Coordination Centre was unable to secure air resources, but at about 17:00 an air crane en route to the Upper Ferntree Gully fire was diverted to assist.<sup>16</sup>



Mr Owen, the RECC Coordinator, feared that the Harkaway fire could have 'followed a similar path of destruction to that of Ash Wednesday'. He adopted a 'triage' approach and focused on developing priorities for the various fires in the area and identifying where the available firefighting resources would best be deployed.<sup>17</sup>

The usual Municipal Emergency Response Coordinator for the area was on leave, and no formal arrangement had been made for anyone to fill his position during his absence. Sergeant Sheree Moore performed the duties of the MERC on 7 February, although she had neither been formally appointed to that position nor been trained for the role.<sup>18</sup>

As the afternoon unfolded Sergeant Moore established roadblocks in the Narre Warren area to control the flow of traffic near the fires. She did this without the benefit of information from the ICC. Later in the day she was able to speak to the Deputy Incident Controller, but her experience was not satisfactory and in her opinion the police had not received adequate information. The lack of information from the ICC made it difficult to situate roadblocks safely—both for residents of the area and for police staffing the roadblocks. From 16:00 Victoria Police set up roadblocks as full road closures; these roadblocks had to be moved a number of times during the ensuing hour because of the speed of the fire.<sup>19</sup>

The south-westerly wind change arrived at 17:45 and pushed the fire towards the Dandenong Ranges.<sup>20</sup>

At about 18:15 the fire was formally escalated to the control of the Belgrave ICC. Mr Colin Brown, a CFA operations officer, became the Incident Controller.<sup>21</sup>

Initially, warnings for the Harkaway fire were handled by the Regional Emergency Coordination Centre. The first warning issued was an alert message at 18:44; it referred to a fire burning in a north-easterly direction between King Road, A'Beckett Road, Harkaway Road and Narre Warren North Road. Mr Brown stated that at the time the alert message was sent the fire was already 'burning out to the Harkaway Road area'. The alert warning was thus too late and of little use to residents.<sup>22</sup>

The fire crossed Harkaway Road at 18:50 and burnt the area between Helleur and King Roads.<sup>23</sup>

At 20:29 the Belgrave ICC released an urgent threat message for Harkaway, Narre Warren North and Beaconsfield Upper. Mr Brown explained that the message was issued 'because of the wind change that had come through and was driving the fire in a north-easterly direction and threatening those areas at that stage'. But the wind change had occurred two hours before, and Mr Brown was unable to explain why the message was not issued earlier.<sup>24</sup>

Subsequently, at 21:40, a downgrade message was released for the Harkaway fire.<sup>25</sup>

By 21:50 the fire was contained.<sup>26</sup>

An alert message was issued at 23:11, saying fire activity was continuing. At 01:25 on 8 February a downgrade message was authorised: it advised that the communities of Harkaway, Narre Warren North and Beaconsfield Upper no longer needed to be on alert.<sup>27</sup>

Overall, the Harkaway fire burnt 147 hectares and destroyed and damaged a number of homes, sheds, garages and outbuildings.<sup>28</sup>

### **The Lynbrook fires**

The Coral Drive fire in Lynbrook started at 16:48 in a grassy area along Coral Drive in Narre Warren South. The grassy area appears to have acted as a corridor, assisting the fire's spread to the boundaries of properties on Langbourne Drive. The cause of the fire has not been determined. Having initially run along the grassy reserve beside Coral Drive, it then headed north-east and crossed Ormond Road.<sup>29</sup>

At about 16:52 Mr Arthur Haynes, a CFA operations officer from the Moorooduc ICC attended the Narre Warren North CFA Control Centre to help the local Incident Controller, Mr Trotter. At 17:40 Mr Haynes became the Incident Controller for the Coral Drive fire and appointed Mr Trotter as his operations officer. Together they divided the fire into sectors and deployed resources accordingly. The strategy was to contain the fire and stop its spread into the Dandenong Ranges.<sup>30</sup>

Mr David Beards, captain of the Narre Warren Brigade, arrived at the Coral Drive fire at 16:55, some seven minutes after ignition. At 17:10 he was advised that a strike team was on its way but that no further resources were immediately available. Subsequently, a number of appliances attended the fire, among them MFB crews and appliances that were covering CFA stations in Dandenong, Hallam and Pakenham.<sup>31</sup>

Another fire, at Golf Club Road in Lynbrook, was first reported at 17:08, when a member of the public telephoned the Cranbourne fire station. The fire's point of origin was in grassland on the western side of the South Gippsland Highway, about 300 metres north of Golf Club Road. The cause of the fire has not been determined.<sup>32</sup>

At 17:08 appliances, including MFB resources, started arriving at the fire. A strike team arrived at 17:30, and from 17:40 onwards a number of additional appliances attended.<sup>33</sup>

Shortly after the fire started it crossed the South Gippsland Highway and entered grassland, threatening a landscaping business where quantities of LPG, petrol, diesel and other chemicals were stored, and damaging a shed.<sup>34</sup>

After the wind changed from south to south-westerly at 17:42, the Coral Drive fire headed to Langbourne Drive and into the transmission line reserve. It then spotted back onto the other side of Ormond Road. With the assistance of firefighting crews, residents of Langbourne Drive tried to defend their properties with buckets and wheelie bins full of water. A number of houses were destroyed. Those burnt on Langbourne Drive were relatively new houses built on suburban-sized blocks and positioned very close together. The land was mainly flat, and there was limited vegetation along the roads.<sup>35</sup>

Mr Beards stated that one of the features of the Coral Drive fire was 'that the residents banded together to help protect their properties ... with buckets, hoses, anything that could carry water to assist in the fire fight'. One house that had a swimming pool was able to be saved because of the availability of water from the pool.<sup>36</sup>

The two Lynbrook fires were initially managed separately. At 18:10, however, Mr Ian Glass, a fire officer with the Cranbourne Brigade, took over the role of Incident Controller for both fires. By 19:01 both fires were reported as being under control. At about 19:15 the strike team was redeployed to the Harkaway fire.<sup>37</sup>

At some time between 19:00 and 19:30 Sergeant Moore received a phone call from Senior Sergeant Hengel (the officer normally assigned to be the Municipal Emergency Response Coordinator), who told her she should activate the Municipal Emergency Control Centre. Shortly thereafter the MECC was opened in Vesper Drive, Casey.<sup>38</sup>

Sergeant Moore agreed that, considering the impact of the Coral Drive fire on the houses on Langbourne Drive, it would have been prudent to establish the MECC earlier, when the damage occurred. She also acknowledged that more formal arrangements about who would fill the role in the absence of the usual MERC would have been helpful. The Commission was advised that since 7 February steps have been taken to improve the relevant police service areas' preparedness for fire.<sup>39</sup>

No formal warnings appear to have been issued for the Lynbrook fires, which burnt 12 hectares and destroyed homes.<sup>40</sup>

### 12.1.2 CONCLUSIONS

Residents of Narre Warren and police in the Casey Police Service Area were surprised by the outbreak of fire in an urban area. In its subsequent research into the three fires, the Bushfire Cooperative Research Centre found that very few residents expected to be affected by bushfire.<sup>41</sup>

The initial attack efforts devoted to each of the fires were successful, and the cooperative arrangements between the MFB and the CFA worked well. Effective managing, resourcing and firefighting on the ground—noting the limited availability of resources in the region from 14:30—averted possible widespread damage to the Dandenong Ranges.<sup>42</sup>

The Commission considers that some of the delays and confusion in communications relating to this fire, and the lack of information flowing to Victoria Police, might have been avoided by earlier escalation of incident management to the Belgrave ICC.

A delay of about two hours in issuing warning messages for any fire is not acceptable. It is unlikely, however, that the delay caused any major detriment to residents, who were apparently alerted to the fires by smoke or information received from friends, family and neighbours.<sup>43</sup>

## 12.2 UPPER FERNTREE GULLY

### OVERVIEW

|                           |                                    |
|---------------------------|------------------------------------|
| <b>Cause</b>              | Unknown. <sup>44</sup>             |
| <b>Fatalities</b>         | No fatalities. <sup>45</sup>       |
| <b>Houses destroyed</b>   | No houses destroyed. <sup>46</sup> |
| <b>Overall area burnt</b> | 4 hectares. <sup>47</sup>          |

#### 12.2.1 SEQUENCE OF EVENTS

The Upper Ferntree Gully fire started at about 15:42, near the Burwood Highway and Quarry Road. It was difficult for firefighters to gain access to the fire because there was a railway line nearby. The cause of the fire is not known.<sup>48</sup>

The fire initially spread south-east through scrubland between the Burwood Highway and Quarry Road. It was spotting in various places along the edge of the Burwood Highway.<sup>49</sup>

From 15:42 onwards a number of brigades were dispatched to the fire. Mr Todd Small, the Ferntree Gully CFA captain, attended the scene and at 15:47 asked for five tankers and then a further three. He established an operations point behind 1140 Burwood Highway at about 16:00.<sup>50</sup>

Prompt warnings were issued for the fire. An alert message for Ferntree Gully and Upper Ferntree Gully was authorised at 15:55. At 16:30 an urgent threat message was sent to the integrated Emergency Coordination Centre for the residents of Quarry Road and the communities of Upper Ferntree Gully, Ferntree Gully and Tremont. The message was downgraded at 17:10.<sup>51</sup>

Mr Colin Brown, CFA Incident Controller at the Belgrave ICC, was informed at 16:37 that the State Duty Officer was sending an air crane to the fire. The air support was diverted, however, to protect assets at Harkaway. At 17:04 a Helitack on its way to Moorabbin for refuelling made a number of rapid drops on the fire, obtaining water from a nearby disused quarry. The Helitack's assistance was vital. Mr Brown explained that when the aircraft arrived the fire had begun to spread to the northern side of Quarry Road and was heading towards residential properties.<sup>52</sup> The Helitack made a single drop and caught the fire right on the cusp of a wind change from the south-west:

By pulling that fire up they prevented the fire possibly spreading ... into the Tremont – Ferry Creek area. We estimate probably within 10 to 15 minutes ... [it] would have been impacting on those houses up there and this would have been a significant event.<sup>53</sup>

At 17:14 Mr Brown received advice that the wind change had reached Moorabbin airport, and a red flag warning was issued by radio to all vehicles in the area at 17:27.<sup>54</sup>

After the south-west wind change the fire spread between homes on the northern side of Quarry Road and headed towards Ferntree Gully National Park. At this time there were wind gusts of up to 90 kilometres an hour.<sup>55</sup>

By 17:30 there were eight tankers, three slip-ons and three pumpers on the ground. The Helitack was still working over the fire as it burned towards Lady's Walk and the Boulevard.<sup>56</sup>

The fire was contained by 18:00, and by 19:09 it was declared under control. Four hectares were burnt, but no houses were lost.<sup>57</sup>

#### 12.2.2 CONCLUSIONS

The Commission notes the opportune arrival of the Helitack and commends the efforts of firefighters. This averted possible widespread damage to the Ferry Creek area and the Dandenong Ranges which posed a very significant potential threat to human life.

- 
- 1 Exhibit 994 – Harkaway Fire – Final Fire Perimeter (CFA.600.006.0002)
  - 2 Exhibit 994 – Lynbrook Fire – Final Fire Perimeter (CFA.600.006.0001)
  - 3 Exhibit 994 – Upper Ferntree Gully Fire – Final Fire Perimeter (CFA.600.006.0003)
  - 4 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [22]–[23], [37]–[38], Annexure 9 (WIT.3004.029.0171) at 0171; Brown T13050:16–T13050:24; Exhibit 608 – Statement of Moore, Annexure 4 (WIT.3010.007.0274) at 0274
  - 5 Exhibit 602 – CFA Incident Report (CFA.001.025.0223); Exhibit 605 – Statement of Beards (WIT.3004.029.0056) [14]–[15], Annexure 3 (WIT.3004.029.0074); Exhibit 606 – Statement of Booth, Annexure 1 (WIT.3004.029.0006) at 0011–0012; Exhibit 602 – Bushfire CRC Supplementary Report (CRC.301.001.0001) at 0092; Exhibit 602 – Victoria Police Incident Fact Sheet (CORR.0910.0033)
  - 6 Exhibit 3 – Statement of Rees (WIT.004.001.0001) at 0110, 0114
  - 7 Exhibit 980 – Correspondence – Houses Destroyed – Breakdown by Fire (CORR.1003.0048\_R) at 0048\_R
  - 8 Exhibit 786 – Statement of Clow (WIT.3004.034.0004) [19.4]
  - 9 Exhibit 786 – Statement of Clow (WIT.3004.034.0004) [19.7]
  - 10 Exhibit 939 – Details Regarding Emergency Response (CFA.600.005.0195) at 0195, 0198; Exhibit 939 – MFB Response (MFB.001.001.0040) at 0040; Exhibit 939 – Day by Day Breakdown – Narre Warren (DSE.HDD.0048.0545\_20); Exhibit 939 – Aircraft Data 0809 (DSE.HDD.0048.0544\_20) at 0544\_25
  - 11 Exhibit 595 – Statement of Owen (WIT.3004.031.0001) [33], [39]
  - 12 Exhibit 595 – Statement of Owen (WIT.3004.031.0001) [21]–[25], [66]–[67], [123], [134]; Brown T13052:27–T13053:7
  - 13 Exhibit 595 – Statement of Owen (WIT.3004.031.0001) [115]
  - 14 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [22]–[23], [37]–[38], Annexure 9 (WIT.3004.029.0171) at 0171; Brown T13050:16–T13050:24; Exhibit 608 – Statement of Moore, Annexure 4 (WIT.3010.007.0274) at 0274
  - 15 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [39]–[45], [55]; Brown T13053:8–T13053:28
  - 16 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [46]–[47], [49]–[53], [64]; Brown T13051:8–T13051:23; Graystone T6034:3–T6034:16, T6073:9–T6073:17
  - 17 Exhibit 595 – Statement of Owen (WIT.3004.031.0001) [150], [156], [161]; Owen T12936:11–T12936:16
  - 18 Exhibit 608 – Statement of Moore (WIT.3010.007.0206) [23]; Moore T13079:16–T13079:27
  - 19 Exhibit 608 – Statement of Moore (WIT.3010.007.0206) [36]–[40]; Moore T13081:14–T13081:28, T13082:7–T13084:12, T13085:16–T13085:30
  - 20 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [71]; Brown T13054:8–T13054:24
  - 21 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [71]; Brown T13054:8–T13054:24
  - 22 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [75], Annexure 11 (WIT.3004.029.0204); Brown T13056:28–T13056:31, T13057:4–T13057:7
  - 23 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [66], [77]–[79], [97], Annexure 4 (WIT.3004.029.0142\_R) at 0142\_R; Brown T13051:29–T13051:31
  - 24 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [90], Annexure 13 (WIT.3004.029.0209); Brown T13057:22–T13057:31, T13058:3–T13058:10
  - 25 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [95], [99], [107], Annexure 14 (WIT.3004.029.0212), Annexure 15 (WIT.3004.029.0215), Annexure 19 (WIT.3004.029.0239)
  - 26 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [66], [77]–[79], [97], Annexure 4 (WIT.3004.029.0142\_R) at 0142\_R; Brown T13051:29–T13051:31
  - 27 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [95], [99], [107], Annexure 14 (WIT.3004.029.0212), Annexure 15 (WIT.3004.029.0215), Annexure 19 (WIT.3004.029.0239)
  - 28 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [23], Annexure 3 (WIT.3004.029.0140) at 0140, Annexure 4 (WIT.3004.029.0142\_R) at 0142\_R; Exhibit 606 – Statement of Booth, Annexure 1 (WIT.3004.029.0006) at 0010–0011, 0016–0026; Exhibit 786 – Statement of Clow (WIT.3004.034.0004) [19.4]
  - 29 Exhibit 602 – CFA Incident Report (CFA.001.025.0223); Exhibit 605 – Statement of Beards (WIT.3004.029.0056) [14]–[16], Annexure 3 (WIT.3004.029.0074); Exhibit 606 – Statement of Booth, Annexure 1 (WIT.3004.029.0006) at 0011–0012; Exhibit 602 – Bushfire CRC Supplementary Report (CRC.301.001.0001) at 0092
  - 30 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [55], [57]–[58], [63]
  - 31 Exhibit 605 – Statement of Beards (WIT.3004.029.0056) [29]–[30], [34], Annexure 5 (WIT.3004.029.0105) at 0106; Beards T13075:3–T13075:18; Exhibit 576 – Supplementary Statement of Murphy (WIT.3006.001.0263) [12]; Murphy T12588:23–T12589:5
  - 32 Exhibit 605 – Statement of Beards (WIT.3004.029.0056) [45], Annexure 6 (WIT.3004.029.0110) at 0110; Exhibit 608 – Statement of Moore, Annexure 5 (WIT.3010.007.0277) at 0278; Exhibit 602 – Victoria Police Incident Fact Sheet (CORR.0910.0033)
  - 33 Exhibit 605 – Statement of Beards (WIT.3004.029.0056) [45]–[46], [48]–[49], [53]–[64]
  - 34 Exhibit 608 – Statement of Moore, Annexure 5 (WIT.3010.007.0277) at 0277; Exhibit 602 – Victoria Police Incident Fact Sheet (CORR.0910.0033); Beards T13072:29–T13073:18
  - 35 Exhibit 602 – Bushfire CRC Supplementary Report (CRC.301.001.0001) at 0086, 0094–0102; Exhibit 605 – Statement of Beards (WIT.3004.029.0056) [17], [32]; Murphy T12596:18–T12596:28

- 36 Exhibit 605 – Statement of Beards (WIT.3004.029.0056) [38]–[39]; Beards T13069:11–T13069:13, T13069:21–T13069:28; Exhibit 606 – Statement of Booth, Annexure 1 (WIT.3004.029.0006) at 0011, 0016–0026; Exhibit 602 – Bushfire CRC Supplementary Report (CRC.301.001.0001) at 0091
- 37 Exhibit 604 – Statement of Brown (WIT.3004.029.0056) [55], [58], [66]–[68], Annexure 1 (WIT.3004.029.0006) at 0011, 0016–0026; Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [66]; Beards T13069:11–T13069:13
- 38 Exhibit 608 – Statement of Moore (WIT.3010.007.0206) [52]–[55]; Moore T13084:13–T13084:21
- 39 Exhibit 608 – Statement of Moore (WIT.3010.007.0206) [48], [76], [88]; Moore T13086:11–T13086:18, T13085:4–T13085:11
- 40 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [23], Annexure 3 (WIT.3004.029.0140) at 0140, Annexure 4 (WIT.3004.029.0142\_R) at 0142\_R; Exhibit 606 – Statement of Booth, Annexure 1 (WIT.3004.029.0006) at 0010–0011, 0016–0026; Exhibit 786 – Statement of Clow (WIT.3004.034.0004) [19.7]
- 41 Exhibit 602 – Bushfire CRC Supplementary Report (CRC.301.001.0001) at 0090
- 42 Exhibit 595 – Statement of Owen (WIT.3004.031.0001) [144], [147]
- 43 Exhibit 602 – Bushfire CRC Supplementary Report (CRC.301.001.0001) at 0090–0091
- 44 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [25], [114], Annexure 5 (WIT.3004.029.0144), Annexure 22 (WIT.3004.029.0248) at 0248; Brown T13061:27–T13061:28
- 45 Exhibit 3 – Statement of Rees (WIT.004.001.0001) at 0112
- 46 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [28]
- 47 Exhibit 786 – Statement of Clow (WIT.3004.034.0004) [19.11]
- 48 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [25], [114], Annexure 5 (WIT.3004.029.0144), Annexure 22 (WIT.3004.029.0248) at 0248; Brown T13061:27–T13061:28
- 49 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [27]; Brown T13063:3–T13063:4
- 50 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [115]–[121], [124]
- 51 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [125], Annexure 23 (WIT.3004.029.0255), Annexure 24 (WIT.3004.029.0258) at 0258, Annexure 27 (WIT.3004.029.0274)
- 52 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [64], [74], [77], [127], [130]; Brown T13062:1–T13062:17, T13063:18–T13063:25
- 53 Brown T13062:11–T13062:17
- 54 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [133], Annexure 6 (WIT.3004.029.0146\_R) at 0146\_R; Brown T13063:29–T13064:2
- 55 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [27]; Brown T13063:12–T13063:14
- 56 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [136]–[137]
- 57 Exhibit 604 – Statement of Brown (WIT.3004.029.0112) [28], [138], [144], Annexure 29 (WIT.3004.029.0278)



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