

IN THE MATTER OF THE INQUIRIES ACT 2014**AND IN THE MATTER OF A BOARD OF INQUIRY
INTO THE MCCRAE LANDSLIDE****ENTITY: SOUTH EAST WATER
CORPORATION****WITNESS STATEMENT OF CHRISTOPHER SMITH**

I, **CHRISTOPHER SMITH**, Network Performance Integrated Planning Manager, South East Water Corporation of 101 Wells Street, Frankston, in the State of Victoria say:

1. I am the Network Performance Integrated Planning Manager of South East Water Corporation (**SEW**).
2. I have held this position at SEW since 6 October 2023.
3. I have a Bachelor of Engineering, which I obtained in 1994 from James Cook University of North Queensland, and over 29 years of civil engineering experience. I am a member of Engineers Australia (EA ID 9527335) and I am on the National Engineering Register (NER), registered in the civil engineering area of practice. I am also a registered as a Professional Engineer (PE0010440) in the State of Victoria in the area of civil engineering.
4. Prior to joining SEW, my experience in the water industry included working with other water utilities in Australia and overseas, and more than 10 years with a large engineering consultancy, rising to principal engineer level.
5. I joined SEW in September 2019 as the Water Network Reliability Planning Manager. This role included leading a team to develop SEW's potable (drinking) and recycled water network reliability asset management plans and development and maintenance of the asset renewal strategy for the potable and recycled water networks. This role also included the development and maintenance of an asset risk model, which is a tool aligned with SEW's corporate risk framework that quantifies and assesses the risks associated with SEW's network assets to enable SEW to make informed decisions regarding asset management.
6. Since October 2023 I am employed by SEW as the Network Performance Integrated Planning Manager. SEW uses an integrated planning and delivery model to plan and deliver its capital works program. This model involves working collaboratively with industry partners to plan and deliver infrastructure upgrades of water and sewer assets. My current

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role is to provide strategic leadership and management of a team of SEW and partner professional engineers and planners within the Integrated Planning team, including for the purpose of the planning and functional design of network assets.

7. On 23 May 2025 the Board of Inquiry into the McCrae Landslide served upon SEW's lawyers a Request to Produce Second Witness Statement, which required SEW to provide a statement in response to the questions set out in that document.
8. The information in this Statement is based upon my personal knowledge, or information I have obtained from the business records of SEW or other employees where necessary. I believe the information to be true.
9. The information in this Statement responds to questions 2 and 3 set out in the Second List of Questions for South East Water Corporation (SEW). I address the questions in that order.

Question 2 – Describe the ongoing process to revise SEW's asset management strategy to better address service areas in SEW's network that are susceptible to landslides or landslips. In particular, identify:

- a. **The methodology being, or proposed to be, used to assess whether an area is susceptible to landslides or landslips; and**
 - b. **The individuals who are responsible for the review, and when the review is to be completed by.**
10. Prior to 2025 all of SEW's assets were managed under SEW's asset management framework, which was comprised of three key documents, being:
 - a. The Asset Management Policy approved on 24 October 2022 and to be reviewed on 24 October 2026;
 - b. The Strategic Asset Management Plan approved 25 February 2019, which refers to key strategic asset management documents and incorporates implementation of asset management plans and performance evaluation and improvement;
 - c. The Water and Sewer Network Reliability Master Plan for the period 2023 to 2028, which forms our Asset Management Plans.

The Asset Management Policy is set out at **Exhibit 1: "Asset Management Policy"** to this statement ('**Asset Management Policy**'). The Strategic Asset Management Plan is set out at **Exhibit 2: "190225 Attachment 1 Draft Asset Management Strategy"** to this statement ('**Strategic Asset Management Plan**'). The Water and Sewer Network Reliability Master Plan is set out at **Exhibit 3: "AM2703 AM2704 Part 2 Water and Sewer**

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Network Reliability Master Plan - Final" to this statement (**'Water and Sewer Network Reliability Master Plan'**)

11. These documents did not expressly refer to landslide susceptibility.
12. From in or about November 2024 SEW commenced updating the Strategic Asset Management Plan, as it was due for review.
13. SEW's revised Strategic Asset Management Plan was approved in April 2025 and Section 7 of that document included express reference to landslips as being a factor in determining whether SEW's assets could exacerbate the risk associated with a landslip as well as whether a landslip could render a SEW asset as vulnerable. SEW's revised Strategic Asset Management Plan approved in April 2025 is set out at **Exhibit 4: "AM2787 - Strategic Asset Management Plan"** to this statement (**'Revised Strategic Asset Management Plan'**).
14. Following approval of the Revised Strategic Asset Management Plan, I have commenced drafting a document that will outline asset management planning process improvement initiatives for areas of landslide susceptibility (currently under the working title of Phase 3 Asset Management Planning Process Improvement Initiatives for Landslide Susceptibility and Risk Assessment). The draft process improvement document is set out at **Exhibit 5: "Phase 3 - Asset Management Planning Process Improvement Initiatives"** to this statement (**'Phase 3 Asset Management Planning Process Improvement Initiatives for Landslide Susceptibility and Risk Assessment'**).
15. The Phase 3 Asset Management Planning Process Improvement Initiatives for Landslide Susceptibility and Risk Assessment document sets out actions, responsibilities and target dates.
16. The methodology we propose to use to assess whether an area is susceptible to landslides is set out in the Phase 3 Asset Management Planning Process Improvement Initiatives for Landslide Susceptibility and Risk Assessment document together with actions to be taken following an assessment of an area as one of landslide susceptibility.
17. Whilst the draft Phase 3 Asset Management Planning Process Improvement Initiatives for Landslide Susceptibility and Risk Assessment is yet to be approved, we have already commenced a number of initiatives.
18. We are in the process of incorporating all the Erosion Management Overlays (**EMO**) available from the Department of Energy, Environment and Climate Action datashare webpage that are relevant to our service area into SEW's Geographic Information System (**GIS**). We are also in the process of incorporating landslide susceptibility information from our own searches, and from Mornington Peninsula Shire Council (**MPSC**) under the *Freedom of Information Act 1982* (**FOI**) in late May 2025, into SEW's GIS. Our own

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searches resulted in the discovery of a paper commissioned by MPSC titled 'GIS Assessment of Regional Landslide Susceptibility, Mornington Peninsula Shire'. The paper commissioned by MPSC is set out at **Exhibit 6: "GIS Assessment of region landslide susceptibility Mornington Peninsula Shire"** to my statement ('**GIS Assessment of Regional Landslide Susceptibility, Mornington Peninsula Shire**'). The documents obtained from MPSC under FOI included GIS data. Those documents, being the GIS data received from MPSC ('**GIS data**') is set out at **Exhibit 7: "GIS data"** to my statement.

19. SEW has created a new tool to view GIS data regarding landslide susceptibility received from MPSC under FOI to create a map of areas that may be susceptible to landslides. An example of this map is **Exhibit 8: "M.App Enterprise"** to my statement. The map can also show SEW's assets.
20. The Phase 3 Asset Management Planning Process Improvement Initiatives for Landslide Susceptibility and Risk Assessment identifies that the GIS data regarding landslide susceptibility received from MPSC under FOI will inform an update to our Asset Risk Management Model (**ARMM**). The ARMM is used to determine which of our assets are critical, and that in turn determines how we manage the risk around those assets and the risk control measures, including renewal.
21. We have also scheduled meetings with planning authorities (municipal councils), commencing with Yarra Ranges Shire Council and Frankston City Council, in the coming weeks with a view to obtaining information regarding potential landslide susceptibility, including geospatial, geotechnical, hydrogeological and drainage information. We have prioritised Yarra Ranges Shire Council based on the breadth of its EMO.
22. Once we receive all the information we seek to obtain from municipal councils, we anticipate reviewing the suitability of that information insofar as it relates to landslide susceptibility (for example, given the limitations noted in 'GIS Assessment of Regional Landslide Susceptibility, Mornington Peninsula Shire'). Depending on the type and quality of the information available, this may inform updates to our critical and non-critical assets and vulnerability and risk control measures so far as is reasonably practicable.
23. The above is only a small number of the actions set out in section 4 of the Phase 3 Asset Management Planning Process Improvement Initiatives for Landslide Susceptibility and Risk Assessment document.
24. I have primary responsibility for preparing and finalising the Phase 3 Asset Management Planning Process Improvement Initiatives for Landslide Susceptibility and Risk Assessment document. However, it will be reviewed by those responsible for individual action items listed in section 4 of that document and approved by Charlie Littlefair (General Manager Liveable Water Solutions).

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25. As noted above, some of the work has already commenced. I anticipate the Phase 3 Asset Management Planning Process Improvement Initiatives for Landslide Susceptibility and Risk Assessment document will be completed by 30 June 2025.

Question 3 – Describe the extent to which (if at all) SEW adopts a different approach to managing its water assets in locations subject to an Erosion Management Overlay.

26. My understanding of management of the design and construction of water assets by SEW in locations subject to an EMO has been informed by SEW's Environment and Approvals team and Delivery teams.
27. I understand SEW adopts different approaches to the functional design and construction of SEW assets in an area the subject of an EMO.
28. For example:
- a. Preliminary environmental checklists (Integrated Planning Preliminary Environmental Checklist and Reliability Preliminary Environmental Checklist) are used for capital project planning within the Liveable Water Solutions Group and these checklists:
 - i. Have been developed and are managed by the Environment and Approvals team;
 - ii. Include a link to VicPlan mapping; and
 - iii. Require relevant overlays (including EMOs) to be identified.
 - b. For reliability water main renewal capital projects, the preliminary environmental checklist identifies overlays including EMOs. If an EMO is identified, it is highlighted as a project risk that needs to be managed and the following automatically generated information is provided: 'EMOs protect areas prone to erosion, landslip, other land degradation or coastal processes by minimising land disturbance and inappropriate development. Please liaise with the appropriate Authority / Council representative and contact the Environment and Approvals team if you need further advice'.
 - c. For capital projects that are not reliability water main renewals, sewer rehabilitation, or pressure sewer connections and are via the integrated planning team, the preliminary environmental checklist asks for an initial statutory planning assessment. Environmental practitioners complete this assessment with engagement of statutory planners if required. If an EMO is identified, this is

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highlighted as a project risk that needs to be managed along with any specific statutory approval requirements (e.g. permits triggered under the EMO).

29. The checklists applicable to examples b. and c. above also have an onsite inspection section, which provides a prompt to identify any additional environmental risks onsite and to attach photographs.
30. The preliminary environmental checklists form the basis of the environmental input for the request for quote or tendering documentation that is provided by SEW to its delivery partners and other potential contractors for quote / tendering purposes.
31. A Construction Environmental Management Plan (**CEMP**) is required for all medium and high environmental risk projects undertaken by the awarded partner and is reviewed and approved by SEW prior to construction. The CEMP includes a risk rating and outlines erosion and sediment controls required for the project as well as a section on site restoration / reinstatement.
32. For projects with low environmental risk, the partner may still develop a CEMP or alternatively rely on the partner's programme wide Environmental Management Plan (including sub-plans) that identify measures to manage key environmental risks (including erosion and sediment control) for the program of works. In addition, the partner may also develop an Environmental Control Plan (**ECP**) that identifies the key environmental risks (higher risks onsite) and outlines the mitigation measures (i.e. if erosion was a particularly high risk, a site-specific erosion ECP may be developed for the project).
33. Other capital delivery projects (e.g. sewer rehabilitation, pressure sewer connection projects, minor works and developer gifted water and sewer assets) adopt a different approach and do not necessarily use the SEW Preliminary Environmental Checklists.
34. As to asset management, the ARMM currently includes EMOs as a presentation layer. That is to say, when the ARMM is being used to support engineering judgements, the EMOs can be used to highlight and inform a potential risk. I address the likely future effect of EMOs in paragraph 14 above.

Dated: 6 June 2025

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