

Canning River Catchment Draft DWSPP (the “Plan”)

Submission by Federation of Western Australian Bushwalkers Inc.

11 May 2007

1. THE FEDERATION’S INTEREST

The Federation of Western Australian Bushwalkers Inc. is a **key community stakeholder** in catchment management issues affecting access to areas covered by the draft Plan and by other recently released draft Plans. (Also see the attached Appendix, Section 1.)

The Federation of Western Australian Bushwalkers Inc. is the peak body representing the nine incorporated bushwalking clubs in W.A. and their 900 members. The Federation is also a part of Bushwalking Australia Inc. representing Australia’s 20,000 organised bushwalkers.

The Federation recognizes that the forested lands that include the drinking water catchments are a community asset and face multiple pressures from multiple users. The Federation accepts that not all existing uses will be compatible with the community’s future needs and other priority uses of the asset without additional investment in water treatment equipment. However, we submit that the nature of our members’ traditional bushwalking activities is such that they are not incompatible with other uses of the catchments, particularly as drinking water source areas.

2. INVITATION TO MAKE A SUBMISSION (refer page iii of the Plan)

The Federation (along with other bushwalking groups and individuals) was very surprised and disappointed that the DoW did not consult the Federation on a DWSP Assessment document leading up to the draft Plan, as per the defined plan development stages outlined in the draft Plan (p. vii), and consistent with the process followed in the “*Harvey Water Pipe Project–Logue Brook Dam Stakeholder Consultation*” in 2006 in which the Federation participated.

The Federation was further extremely disappointed not to have been directly invited to comment on the draft DWSPP upon its release on 6 February 2007. The DoW’s own words of encouragement to the community to read the draft Plan (refer page iii, para. 1) appear inconsistent with its lack of any direct and timely invitation to bushwalking groups to respond to the draft. It is also inconsistent with the level and spirit of community consultation prescribed elsewhere (e.g. ADWG Section 3.8; pp. 3.27-3.28).

Furthermore, we regard the short period originally set for public submissions on the Plan (6 February to 23 March 2007) to have been inadequate for proper public review and response, especially given the absence of prior consultation with the Federation as a key stakeholder at the earlier Assessment (DWSPA) stage which is indicated in the table on page iii. In view also of the popularity of the Canning River Catchment, a minimum period of six months would have been more appropriate to the interests of a proper public response to the draft Plan. During this time presentations, workshops and Q&A sessions should have been offered by DoW particularly in the Perth area using the recent Logue Brook Dam process as an example.

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3. GENERAL COMMENTS ON THE DRAFT PLAN

We are pleased that bushwalking is recognized by DoW as an existing “*approved recreation*” activity in the Summary of the subject draft Plan (p. viii).

The Draft’s “**Summary**” (page viii) correctly acknowledges that “*the catchment is popular for.....bushwalking, including the Bibbulmun Track.*” The catchment area has high existing and future recreational potential for the bushwalking community.

An additional attraction of the area is that, while being accessible, it also offers scope for ‘off-track’ bushwalking for walkers who want variety and more solitude, away from the popular, heavily used, existing trails such as the Bibbulmun Track. Ironically the absence of formed “trails” in many popular bushwalking areas and the lack of published ‘route’ maps for most areas can be mistakenly taken to suggest that those areas are seldom visited and have no special recreational amenity value to the community.

4. SPECIFIC COMMENTS ON THE DRAFT PLAN

Page vii, para.1: “...to recommend management strategies to minimise the identified risks”. And also **page 19, Section 4.9, para.1:** “...recommends protection strategies to minimise these risks”. The Federation agrees that the strategies should be to consistently *minimise* and manage risks. However, elsewhere in the Plan (e.g. **Page 14, para.1**) there are statements such as “*The objective...is to protect water quality by avoiding risks ...where possible*”. (Similarly, on **page 15, para.2:** “*The objective is to preserve..quality..by avoiding risks..*”) **Page vii, para 2** refers to “*avoid, minimise or manage risks.* This points to some confusion and inconsistency in approach. For the reasons summarized in the attached **Appendix 1, Sections 4.2-4.4**, the Federation urges a policy of consistent risk minimisation and management as the appropriate course. A partial policy of ‘*risk avoidance*’, other than within a vegetation buffer zone of appropriate width surrounding the reservoir (refer WQPN6 of February 2006), is contrary to the interests of both a) accountable water management and b) low risk, traditional recreational pursuits such as bushwalking.

Page vii, Table: “*Stage 2*” of the outlined stages in preparing a Drinking Water Source Protection Plan have not been followed. The Federation is well known to DoW as an actively interested stakeholder in catchment management and access issues but was not approached for comment or advice “*using the Assessment [document; DWSPA] as a tool for background information*”, nor has the Assessment document been available for viewing on the DoW website. As noted above (Section II), the draft Plan document was also subsequently released onto the DoW website for public comment (Stage 4) without any direct advice to the Federation as a known interested stakeholder. Without an opportunity for fair and proper consultation, key stakeholders, interested groups and the community in general cannot be expected to respect the declared Plan preparation process and to accept the outcome as being objective and apolitical.

Page viii, para.3 (Summary), and similarly p.14, para.2: “*...activities that require body contact with the water are not considered acceptable..*”. The Federation acknowledges and agrees with that position.

Page viii, para.5 (Summary): “*The catchment is popular for...bushwalking, including on the Bibbulmun Track ...*”. Similarly on **Page 10, para.8:** “*Bushwalking occurs throughout the catchment, particularly along the Bibbulmun Track...*” The Federation agrees with those statements. However, it could also be usefully noted that examples of popular traditional

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bushwalking areas within the catchment, aside from the more recent Bibbulmun Track, include the 'Gibbs Rock' and 'Geddes Rock' areas, areas east of Mounts Randall and Cooke, the Lesley area, and the Boulder Rock area.

Page 7, para.1, (Microbiological contaminants): *“Microbiological quality of raw water from Canning Reservoir is measured regularly..”*. The Federation would welcome access to the data from the Water Corporation over the last few years from the Canning River Catchment (and others) to independently interpret the existing evidence of risk from pathogens prior to treatment.

Page 8, para.2 (Microbiological contaminants): *“Between..2001 and ..2006..E.coli were recorded in 42% of samples taken. None of these...had counts greater than 20MPN/100mL.”* For clarity and objectivity it should be added in para. 2 (rather than only on Appendix A, page 47) that *“A count of less than 20MPN/100mL is typically associated with **raw water that has not been recently contaminated with faecal material.**”* i.e. Over almost 6 years of regular measurements and records there has been no evidence of significant faecal contamination. This should be taken into account in proposing an appropriate risk management plan that also takes account of historic levels of activities within the catchment area, including bushwalking. This evidence suggests there is no current or future need for strong action to limit such activities, provided that continued regular monitoring in the future shows no increase in *E. coli* counts to significant levels.

Page 11, para.2 (Land use and contamination risk; Crown land; Recreation): *“Boulder Rock picnic site on Brookton Highway has been closed to prevent misuse.”* The recent permanent closure of the popular and historic Boulder Rock picnic site followed a bushfire in January 2005 and has been explained by DoW elsewhere as reflecting a decision by CALM/DEC not to upgrade the site's facilities due to ongoing negotiations between the Nyoongar elders regarding its future use, the site also being a registered site under the Aboriginal Heritage Act 1972. Although the car park and access way are in the process of being rehabilitated it would be appropriate that broader public consultation still occur on the potential for future public access to this site. Concerns about risks to water quality could have been addressed by introduction of toilet facilities etc which have been lacking throughout the site's long history (i.e. in excess of 20 years).

Page 11, para.3 (Land use and contamination risk; Crown land; Recreation): *“There is a fully serviced day-time picnic area immediately downstream of Canning Dam”*. The existence of this picnic area adjacent to the river in the catchment area of the Araluen Pumpback highlights another inconsistency in the risk management approach. The general public is actively encouraged to use that picnic area (and similarly the lower picnic area at Serpentine Dam), yet elsewhere in this draft Plan there are statements regarding the high risk and unacceptability of human activity in proximity to Canning River proper, or its tributaries. Whether or not such picnic areas are in fact *“intensively managed”* (as stated) to minimise risk, they clearly still have a substantially higher potential risk for water quality than a much lower intensity activity such as bushwalking.

Page 11, para.5 (Land use and contamination risk; Crown land; Recreation): *“Unauthorised camping (outside of designated areas) and unauthorised trail establishment occur more and more frequently in the Canning catchment. This may be associated with the walk and bike trails,...”* *“Such activities [unauthorized camping and unauthorised trail establishment] represent a significant risk to water quality”*.

With regard to “camping” activities: the Federation points out that in WRC Statewide Policy 13, Table 1, the activities of *“Camping”* and *“Backpacking with overnight stay”* are appropriately identified as separate line items which avoids confusion between higher intensity (and therefore higher risk) camping activities and the very low impact, low risk traditional

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overnight camping activities of bushwalkers. Whenever “camping” is referred to in the document it should preferably be clarified whether it is using a broader definition, or the definition implied in Policy 13 (i.e. excluding Overnight stays).

As the DoW is aware, organized bushwalking with overnight stays has been a traditional activity within the catchment and the Federation continues to seek flexibility to continue that activity under appropriate approvals and controls (refer attached **Appendix I, Section 4.7**). Overnight stays outside the RPZs and away from water courses and tracks are low intensity, low impact and low visibility, and present minimal risk to water quality. They involve only occasional, transitory, single night camping by bushwalkers ‘passing through’ and leaving no trace. Locations are temporary and are accessible only by backpacking, being remote from roads and tracks. Due to their transitory purpose, non-visibility, and isolation, they are not prone to later visits by individuals. The Federation’s members do not camp close to the reservoir or tributaries. Furthermore the five existing Bibbulmun Track designated campsites ‘service’ only a very small portion of the total Mundaring Catchment of around 1400 sq km. Without overnight stays, non-Bibbulmun Track bushwalkers would therefore be limited to day walks only.

With regard to “unauthorized trail establishment” activities: The Federation suggests the statement that “...unauthorized trail establishment occur(s) more and more frequently.” Should be qualified by adding the words “primarily due to increasing illegal trail bike and mountain bike riding”. It is important that it be recognised that walking “trails” are not recent developments. Most worn walking trails have been established gradually over many years by many walkers following exactly the same route and should not be wrongly interpreted as due to “unauthorised trail establishment”. Furthermore, if particular existing ‘established’ trails pose specific risks such as the feeder stream crossing in Photo 7, those risks could be readily identified and mitigated (e.g. by bridging the stream or by rehabilitating the offending trail).

In relation to bushwalking, DoW also needs to be aware that the Federation’s members do not establish new **visible** tracks or trails where none existed before (refer attached Appendix I, Section 3, Minimum impact). Most of the ‘off-track’ bushwalking areas within the catchments show no signs of worn trails despite many visits over many years by keen bushwalkers. The lack of worn trails is because off-track bushwalkers seldom follow the exact same route on more than one occasion and also because their walking is very low intensity and low impact.

With regard to “significant risk to water quality”: As above, the Federation points out that although high intensity “camping” activities may be considered a potential risk, traditional backpacking with “overnight stays” carries minimal risk to water quality and the two activities therefore need to be clearly differentiated. Furthermore, this paragraph includes an activity such as “unauthorized camping” in the same “significant risk” category as “illegal fishing” (and marroning). That is very misleading especially if the term “camping” is used broadly to include “overnight stays”. Fishing/marroning is a potential risk involving likely direct contact with the water. “Overnight stays” outside of the RPZs and away from feeder streams have minimal risk and should not be considered in the same category as direct ‘water-contact’ activities.

Page 11, para.6 (Proposed land uses): “Bauxite mining is unlikely to occur in the Canning catchment, and certainly not within the next 20 years.” That statement appears to ignore the **Worsley Bauxite mining expansion Environmental Review and Management Programme (ERMP), May 2005**. The potential impact of Worsley’s plans on the headwaters area of the Canning River catchment should be noted (also in Table 1 of the Plan). The Worsley expansion plans also impact on traditional bushwalking activities (including backpacking with overnight stays) within the southern area of the catchment.

Page 12, para.4 (Proposed land uses): “All of these activities [including bushwalking] represent significant risks to water quality. ...as Perth’s population continues to grow, demand for recreation opportunities will also increase, along with the instances of unauthorized or

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illegal activities". Catchment management needs to be much more receptive to the growing demands of recreational activities of the growing Perth population. Thus we need firm data on the actual risks involved with specific activities such as backpacking with overnight stays away from stream courses and outside the RPZ. The Plan offers no commitment to scientific research into the risks associated with such activities. Instead there is a blanket refusal to allow such activities, simplistically 'lumping' low risk activities (such as backpacking with overnight stays) in with clearly higher risk activities such as fishing/marroning and camping close to the water). This apparent policy of 'risk avoidance' can be perceived as a water management tool of convenience, rather than addressing any real risk of adverse effects on water quality. It is leading to unnecessary prohibition of patently minimal risk activities and the resulting loss of valued amenities such as bushwalking areas, at a social cost to the community. (Refer also to the attached **Appendix I, Sections 4.2 & 4.4**).

Page 14, para.1 (Catchment protection strategy; Protection objectives): "*The objective...is to protect water quality by avoiding risks ...where possible*". See comments above in relation to **Page vii, para.1.**

Also "...activities which require contact with the water body are considered not acceptable in this catchment." It would be useful here to specify specific examples of the type of activities that are regarded as requiring direct contact with water. Presumably such activities would include swimming, fishing, marroning, boating, etc. As noted above (see **Page 11, para.5** and **Page 12, para.4** comments) the Plan frequently appears to 'lump' higher risk activities such as those (involving likely direct contact with the water) and camping close to the water, with low risk traditional activities such as backpacking with overnight stays outside of the RPZs and away from feeder streams.

Page 15, para.2 (Catchment protection strategy; Protection classifications): "*The objective is to preserve..quality..by avoiding risks..*". See comments above in relation to **Page vii, para.1.**

Page 15, para.8 (Catchment protection strategy; Protection zones): "*The RPZ include the reservoirs as well as an area approximately 2 km around the top water level of each reservoir.*"

Until the necessary risk assessment work has been undertaken to establish appropriate levels of protection, the Federation accepts that it is prudent and consistent with "*best practice*" to maintain a safety buffer around drinking water sources. However, the basis and need for a prohibited zone as wide as 2 km as first prescribed over 25 years ago, and the nature of the restrictions and/or exclusions applying to that zone, needs urgent review. Many of the best traditional bushwalking areas are within 2 km of water source areas. WQPN6 of February 2006 (which represents DoW's current "*best practice*" with regard to vegetation buffers around sensitive water sources) recommends only a minimum 200m sub-zone within the RPZ itself as a total activity-exclusion buffer zone.

The Federation urges the DoW to i) further favourably consider what reduced safe buffer width is actually necessary around the shorelines of drinking water reservoirs; and ii) to help facilitate changes in legislation to provide for a 'prohibited zone' or RPZ width of less than 2 km (or alternatively a reduced bushwalking exclusion zone of less than 2 km within the RPZs).

Please refer to the attached **Appendix I, Sections 4.1, 4.5 & 4.7** for a more detailed outline of the Federation's position on the 2 km 'prohibited zone, RPZ and related issues.

Page 20, (Table 1, Livestock grazing): "*Existing land uses are acceptable with Best Management Practices*". "*Existing agricultural activities on private land are low intensity grazing..*". "*Farm animals and domestic animals*" are noted to be a "*Hazard*" requiring "*High*" management priority, recognizing that such animals are a source of "*pathogen contamination*". However, the Plan makes no mention of the risk of "*pathogen contamination*" due to **native fauna**.

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Scientific research has shown that native fauna also excrete pathogens such as *Cryptosporidium* sp. in their faeces and thus may also pose a risk to the water supply. Researchers have reported that *Cryptosporidium* oocysts were found “in every stream, no matter how small, remote and pristine, and how close to the source” in protected areas of Australia that are home to a wide variety of small- to medium-sized mammals and lack livestock intrusion (refer R. Buckley and W. Warnken, “*Giardia and Cryptosporidium in Pristine Protected Catchments in Central Eastern Australia*”, 2003, *Ambio*, Vol. 32, No.2; pp.84-86).

Similarly animals die and decompose within the catchment (including along roadsides, following ‘road-kills’) and release pathogens. How does the DoW view the risk of pathogen contamination from sources such as decomposing animal carcasses (as mentioned on Page 24) and native fauna compared to the risk posed by low intensity traditional recreational activities such as bushwalking and backpacking with overnight stays? What is the basis for any differences in management priority and preventative measures? We note that one “preventative measure” against the risk from decomposing carcasses is simply that “water quality is monitored regularly..” (as stated on Page 24).

Page 25, (Table1, Bauxite mining): “Bauxite mining is unlikely to occur in the Canning catchment”. See comments above in relation to **Page 11, para.6 (Proposed land uses)**.

Page 26, (Table 1, Indigenous Cultural activities): “Due to the relatively low number of people involved, indigenous cultural activities are not considered to pose a water quality risk”. “Aboriginal cultural activities are minimal.” Hazard: “Pathogen contamination from people remaining in the catchment for extended periods and possibly camping, and through direct contact of humans and pet dogs with the waterbody”. The Federation points out that bushwalkers are similarly low in numbers, are never accompanied by pets, and don’t access the water at all. Traditional bushwalking activity within the catchment, including backpacking with overnight stays is also low intensity and should therefore similarly not be regarded a risk to water quality. The Federation respects indigenous cultural activities, and acknowledges they are traditional to the catchment. However, varying protection strategies for otherwise comparable activities strongly suggests that the policy of ‘risk avoidance’ is one of convenience rather than necessity. Our comments above on **Page vii, para.1** are also relevant here.

Page 27, (Table 1, Roads, tracks and trails): “No further trails to be developed in the catchment without consultation with relevant agencies”. See comments above in relation to **Page 11, para.5**.

Page 30, (Table 1, Research projects): Research projects may include “people remaining in the catchment for extended periods, particularly close to or on the reservoir”. “The risk associated with this activity is minimal, due to low numbers...and the ease of education prior to the activity..” and “ensure people involved are aware of water quality protection”.

As outlined in the attached **Appendix I, Section 4.7**, the Federation will be proposing to DoW conditions and controls for bushwalking activities that would ensure at least the same “minimal” level of risk which DoW already attributes to **Research Project activities** in the catchments. Research projects and bushwalking activities would similarly involve “low numbers of people”, “management controls”, and “ease of education prior to the activity”. i.e. the same considerations for management which made research projects an “acceptable activity with Best Management Practices”. Bushwalkers are a very environmentally aware and responsible group and the Federation ensures its members are very aware of minimum impact practices and the protection of water quality.

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Table 1 does not include Bushwalking as a Land Use/Activity. This is an oversight which needs addressing. The Federation offers the following suggested content to insert into Table 1:

Activity	<p>Bushwalking, including backpacking with overnight stays.</p> <ul style="list-style-type: none"> • Bibbulmun Track • Organised and informal activities away from the Bibbulmun Track.
Hazard	Pathogen contamination from people remaining in the catchment for extended periods, including occasional overnight stays.
Management priority	Low
Consideration for management	<ul style="list-style-type: none"> • Bushwalking through well-organised groups such as the member Clubs of the Federation of Western Australian Bushwalkers Inc. can be managed through approval/s and education. • Bushwalking is a traditional activity in the catchment and is not confined to the Bibbulmun Track. It is low intensity and low impact. Bushwalkers have historically been consistently very responsible and aware of water quality protection issues, including sanitation and hygiene. • Organised bushwalking groups are small and well managed. • Bushwalking does not involve contact with the water body and walkers are educated to stay out of, and away from, water courses. • Traditional ‘off-track’ bushwalking does not create new visible “trails” and does not contribute to turbidity. • ‘Off-track’ bushwalking routes cannot be followed by non-bushwalkers and individuals. • Overnight stays involve only occasional, transitory, single night camping by backpackers ‘passing through’ and leaving no trace. Locations are temporary and are accessible only by walkers, being remote from roads and tracks. Due to their transitory purpose, non-visibility, and isolation, they are not prone to later visits by individuals. • Low numbers and hygienic burial of human waste ensure minimal risk of pathogen contamination.
Current preventative measures	<ul style="list-style-type: none"> • Regular inspections of the Bibbulmun Track by catchment rangers. • Catchment surveillance by Water Corporation rangers.
Recommended protective strategies	<p><i>Acceptable activity, with conditions.</i></p> <ul style="list-style-type: none"> • Undertake further discussions with the Federation of Western Australian Bushwalkers Inc. to establish suitable conditions and approvals for continuing bushwalking activities (with overnight stays) within the catchment (see *1 below). • Ensure acceptable activities occur only outside the RPZ. • Review the possibility of reducing the 2 km exclusion zone to a lesser width to provide opportunity for continued bushwalking in areas known to include the ‘best’ traditional walking areas. • No new formed trails to be developed in the catchment without consultation with relevant agencies. • Ensure an environmental management plan is developed, implemented and audited for all bushwalking ‘on-track’ trails which addresses water quality protection objectives, such as the maintenance of the trails and associated campsites. • Use signage and brochures to educate on the importance of protecting drinking water quality.

(*1) Also refer to **Appendix I, Section 4.7** which outlines the Federation’s current proposal for continued bushwalking with overnight stays.

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Page 31, Table 1 (Orienteering and rogaining): *“people remaining in the catchment for extended periods...”. “Camping is frequently associated with rogaining..although campsites are usually outside of catchment areas.” “..run by organised groups can be managed through approval and education”. “organised groups have been well managed,...were very responsible and willingly promoted water quality issues”. “Acceptable activities with conditions”.*

Similar to Research activities (see comments above re **Page 30**), DoW considers these activities as “Acceptable”. Both orienteering and rogaining are relatively high intensity events, often with large numbers of people participating in individual events. “Chemical toilets” are therefore obligatory. Despite the large numbers that attend the activities, camping within the catchments is not ruled out.

On the other hand, bushwalking with overnight stays is a much lower intensity, low impact activity. The Federation therefore trusts that its proposals in the attached **Appendix I, Section 4.7**, regarding the continuation of traditional bushwalking activities in the catchment will be accepted.

Page 33, Table 1 (Camping, including undesignated camping): *“Undesignated camping is prohibited in the catchment” and “..sites chosen are generally close to the reservoir or tributaries.” “Ensure designated camping sites are established away from the reservoir and tributaries and outside the RPZ.”*

As in Policy 13, Table1, ‘backpacking with overnight stays’ needs to be differentiated from conventional “camping” activities (see also comments above re **Page 11, para.5**). Bushwalkers’ overnight stays are a traditional low intensity, low impact, low risk activity in the catchment and should be an acceptable activity, with conditions, as noted in the comments above under **Page 31, Table 1 (Orienteering and rogaining)**. The Federation’s members do not camp close to the reservoir or tributaries.

Also refer to **Appendix I, Section 4.7** which outlines the Federation’s current proposal for bushwalking with overnight stays which includes the concept of ‘temporary designated campsites’. In addition, new designated “camping” sites should be agreed in consultation with the Federation. i.e. Sites suitable for bushwalker overnight stays remote from the Bibbulmun Track and other tracks, and also away from the reservoir, water courses and RPZ.

Page 35, Table 1 (Picnicking): *“Picnicking is an acceptable activity at designated sites only.” “The risk is increased by proximity to the reservoir”.*

For clarity it would be useful to insert a definition of “picnicking” as used in Table 1. Presumably it is intended to cover only sites which are focused on group ‘picnic’ activities as the primary activity. It would then not unintentionally include small-scale ad hoc ‘picnic’ activities such as bushwalkers stopping for a sandwich and drink at some point along the Bibbulmun Track or in the forest.

The statement that the *“The risk is increased by proximity to the reservoir”* is an important broader recognition that risk also reduces with increasing distance from the reservoir. That observation is also made on page 39 in relation to herbicide use along road verges in the catchment, but could usefully be repeated elsewhere in the document in view of its relevance to management priorities and protection strategies outside of the RPZ.

Page 36, Table 1 (Motor rally events): *“It is recognised that rallies which may be held are national events of significance for the local area, ...and...approval will continue to be given to stage pre-existing events in the catchment”. “Competitive motor rallying is not compatible with water quality protection” but “Existing events are acceptable with Best Management Practices”.*

The recommended protection strategy (for the short-term) reinforces an impression that water quality risk considerations are not ‘serious’ and can be overridden (or conversely, used) simply

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for management or political convenience. (See similar comments above re **Page 12 para.4** and **Page 26**).

Page 38, Table 1 (Illegal Hunting): *“Pathogen contamination from feral animal carcasses”*. (See also comment above re **Page 20, Table1**). In the interests of risk identification and awareness, the risk from native animal carcasses should also be identified in the Table as a risk. Native animals (and carcasses) would be in greater numbers than feral pig carcasses.

Page 41, Table 1 (Importing water from sub-catchments): *“The Water Corporation monitors the water quality of water”*. The Federation is keenly interested in the quality of water prior to treatment and seeks access to the historical data for review.

Page 43, para.3 (Recommendations): *“Discussions should be held with...other stakeholders to improve recreation management in drinking water catchments, ensure appropriate recreational facilities are provided outside of these catchments wherever possible, and only permit low risk recreation activities in low risk areas (Applicable stakeholders).”*

DoW has minimal ability to influence opportunities for alternate recreational facilities outside its own area of responsibility, being the catchments. Consequently in the best interests of the community, DoW’s focus should be more positively on ensuring traditional activities within the catchments can be continued wherever possible, if necessary under special conditions and controls that reasonably address the perceived risks. As above, refer to the attached Appendix I, Section 4.7 for the Federation’s current proposal.

DoW (and DEC) should have senior representation on the current Premier's Physical Activity Taskforce. Those two bodies are the most relevant regulatory bodies to the issues of access to bushwalking areas in the Perth region. Such representation, alongside the existing representation from DSR, DPI, etc, and broader community representation, would seem one of the keys to ensuring dialogue and cooperation between the relevant Government departments and with the community on removal or suitable adjustment of any unnecessary regulatory barriers to bushwalking activities.

Page 43 (Recommendations): Additional Recommendations should be added as follows:

- 15 **Undertake more rigorous risk analysis of individual actual and potential activities within the RPZ and the broader catchment.** The application of the policy of ‘risk avoidance’ on individual activities must be regarded as a provisional approach pending new information and analysis, and also mindful of community needs and priorities in addition to water quality protection.
- 16 **Review the necessity for an exclusion zone as wide as 2 km around the reservoir and whether a significantly narrower zone would provide a sufficient protective ‘buffer’ and be in the broader community interest.**

Page 56 (References): Additional references might usefully include:
MWSSDA (1909, 1925) : referred to on pages 4 & 14.