

# Serpentine Area Catchments Draft DWSP (the “Plan”)

Submission by Federation of Western Australian Bushwalkers Inc.

16 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. 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 DWSP 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 organised bushwalking groups to respond to the draft. It is also inconsistent with the statement in the **Summary (page ix, para.5)** that “*This draft plan has undergone **extensive** consultation during the development process*”, and also with the level and spirit of community consultation which is prescribed elsewhere (e.g. ADWG Section 3.8; pp. 3.27-3.28) and in Section 4.1 of the Plan which states (page 14, para.5): “*This plan aims to balance water quality protection and social and environmental needs and aspirations*”.

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 Serpentine area catchments, 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.

### **3. GENERAL COMMENTS ON THE DRAFT PLAN**

The Serpentine area catchments have high existing and future recreational potential for bushwalking activities. The Federation's members participate in well organised group bushwalking activities within these catchments and have done so for many years. Examples of popular traditional bushwalking areas for the Federation's members within the catchment, aside from the Bibbulmun Track, include at least the following:

**Windsor Rocks, Mount Solus, Boonerring Hill, Mount Randall and Karnet Rock areas.**

The Federation is therefore pleased that bushwalking is recognized by DoW in Table 1 as an "Acceptable activity with conditions". It is disappointing however that bushwalking as an activity is overlooked in the Summary (see comments below re page viii) and is also inappropriately treated jointly with cycling as a land use/activity (see comments below re Pages 38-39, Table1) perhaps on the simplistic basis that both activities include parts of existing trails within the catchment (i.e. the Bibbulmun Track and Munda Biddi Mountain Bike Trail). The Federation submits that Bushwalking must be recognized as a separate Land Use/Activity, as distinct from Cycling in Table 1. Accordingly, appropriate content for insertion into Table 1 is provided below (see under Pages 38-39).

### **4. SPECIFIC COMMENTS ON THE DRAFT PLAN**

**Page vii, para.1:** "...to recommend management strategies to minimise the identified risks". (and similarly **Page 20, para.1**). The Federation agrees that the strategies should be to consistently *minimise* and manage risks. However, elsewhere in the Plan (e.g. **Page 15, para.2**) the "fundamental water quality objective" with reference to the Priority 1 area classification is "risk avoidance". DoW is therefore recommending a policy of "risk avoidance" (not risk minimization) effectively across the entire Serpentine catchments (refer Figure 4, page 17). This points to apparent confusion 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 2), the draft Plan document was also subsequently released onto the DoW website for public comment (as per "Stage 4", page vii) without any direct advice to the Federation as a known interested stakeholder. Without an opportunity for full 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.8 (Summary):** “Approved recreation in the catchment includes orienteering, rogaining, [etc]...activities”. “The Bibbulmun Track...also passes through the catchment”.

We note that bushwalking “throughout the catchment” is recognised on page 12 of the Plan and as an “Acceptable activity with conditions” in Table 1 (page 38), but is not included alongside the other recreational activities mentioned in the Summary as an “approved activity” despite the mention of the Bibbulmun Track. It would be appropriate to also clarify that “the catchment is **popular** for...[the various recreational activities mentioned]...including bushwalking. The reference to the Bibbulmun Track would be more accurately expressed as “**Bushwalking occurs throughout the catchment, including along the Bibbulmun Track...**”.

**Page 7, para.4, (Microbiological contaminants) and Page 56 (Appendix A):**

“Microbiological quality of water is measured regularly..”. “..on a weekly to monthly basis, particularly during summer and autumn”. The Federation would welcome access to the data from the Water Corporation over the last few years from the Serpentine catchments (and others) to independently interpret the existing evidence of risk from pathogens prior to treatment.

**Page 7, para.4 (Microbiological contaminants) & Page 56 (Appendix A):** “There is a **significant** presence of ...*E.coli*...in the raw water.” “Serpentine Pipehead Dam records a **significantly** higher proportion of samples with coliforms..., which is of **significant concern...**”. “At Serpentine Dam the proportion with....positive counts is much less than some other surface water catchments on the Darling Scarp that have **greater human activity** in their catchments”. “...storage and chlorination generally removes all trace of contamination”.

If microbiological data is to be used as a future water quality management tool then it must be acquired rigorously and interpreted objectively.

For example, for clarity and objectivity, para.4 should more accurately reflect the actual information given in Appendix A which states in part: “During the reviewed period of ..2001 to ..2006, positive *E.coli* counts were recorded in 40% of samples, with 1% of the positive samples exceeding 20cfu/100mL.” “A count of less than [that] is typically associated with low levels of contamination” (or in other words, associated with raw water that has not been recently contaminated with faecal material; as described in another current draft DWSP) i.e. **Over almost 6 years of regular measurements and records only 1% of the 40% of positive samples (or a net 0.4% of total samples, or 4 out of every 1000 samples) have actually shown “significant” faecal contamination.**

Para.4 then implies that the apparently very low counts (“much less”) at Serpentine Dam may reflect less intense “human activity” than in other Darling Scarp catchments. As acknowledged in Appendix A, *E. coli* resides in the intestines of “warm-blooded animals” generally (similar to *Cryptosporidium*), and is not restricted to humans. It is a highly specific indicator of faecal contamination in drinking water, but not necessarily of a human source.

It is therefore very misleading to imply that human activity and human faeces would be the likely source of such contamination in the Darling Scarp reservoirs. There are also likely to be significant animal reservoirs of *E. coli*, such as feral pigs and native fauna. In the interests of a balanced assessment of hazards and risk levels those cannot be ignored. In fact in May 2005 Melbourne Water (Victoria,) requested that emus on a reserve be destroyed as there was concern that they might be carriers of *E. coli* and therefore were seen as a threat to water quality. The Federation would suggest that action was probably extreme and out of all proportion to the risk. However, it highlights the need for objectivity and perspective in assessing and managing risks.

Given the above, DoW should review its criteria for asserting that there is a “**significant concern...**” associated with the net 0.4% of total samples in the Serpentine [Pipehead?] Dam

water that had coliform counts in excess of the low contamination threshold. If DoW in fact has “*significant concern*” with the recorded levels it would seem prudent to immediately introduce a more rigorous water monitoring schedule than the current “*..weekly to monthly basis, particularly during summer and autumn*”.

The Federation submits that risk to water quality from its members organised bushwalking activities within the catchments is negligible compared to other likely, identifiable risks.

**Page 12, para.1 (Land use and contamination risk; Crown land; Recreation):** “*There is a fully serviced picnic area immediately downstream of Serpentine Dam (in the Serpentine Pipehead catchment)*”. The existence of this picnic area within close proximity to the water body of the Serpentine Pipehead Dam highlights another inconsistency in the risk management approach. The general public is actively encouraged to use that picnic area (and similarly the area adjacent to the Araluen Pumpback below the Canning Dam), yet elsewhere in this draft Plan there are statements regarding the high risk and unacceptability of human activity in proximity to Serpentine reservoir, or its tributaries. Whether or not such picnic areas are intensively managed 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 12, para.2 (Land use and contamination risk; Recreation):** “*Bushwalking occurs throughout the catchment, particularly along the Bibbulmun Track*”. The reference to the Bibbulmun Track would be more accurately expressed as ‘**Organised bushwalking occurs throughout the catchment, including along the Bibbulmun Track...**’, as also noted in comment above re **Page viii, para.8**.

The Federation’s members participate in well organised group bushwalking activities within the catchments and have done so for many years. As noted in the attached **Appendix 1, Section 4.6**, the activity of bushwalking (both on-track and off-track) appears to have been rightly recognized by the regulators over many years not to have been incompatible with the protection of drinking water quality. Bushwalking clubs were allowed reasonable access to the water catchments, including areas now captured within RPZs.

The Serpentine area catchments have high existing and future recreational value for the Federation’s members. An attraction of the catchments is that, while being reasonably accessible, they also offer scope for ‘off-track’ bushwalking for walkers who want variety and more solitude, away from the popular, heavily used 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. As also noted in Section 3 above, examples of popular traditional bushwalking areas for the Federation’s members within the catchment, aside from the Bibbulmun Track, include at least the following:

**Windsor Rocks, Mount Solus, Boonerring Hill, Mount Randall and Karnet Rock areas.**

**Page 14, para.5 (Catchment protection strategy; Protection objectives):** “*This plan aims to balance water quality protection and social and environmental needs and aspirations*”. See comments above under Section 2 (Invitation to make a submission).

Also “*Where constraints are required on recreational activities, opportunities for these activities should be catered for in other more appropriate locations*”. This statement implies that there are good alternative opportunities that might be available. In the case of organized bushwalking, the suggestion that there are other areas that could be legally accessed ignores the fact that many of the best traditional bushwalking areas close to Perth are within the catchment areas. As summarized in **Section 1** of the attached **Appendix**, there is a need to at least maintain

existing organized bushwalking opportunities close to Perth, for both single day and longer walks with overnight stays, and for the many walkers who most enjoy walking ‘off-track’ in the more remote forested areas such as the Serpentine catchments offer. Furthermore, DoW has minimal ability to influence opportunities for recreation outside its own area of responsibility, being the catchments. Consequently in the best interests of the community, DoW’s focus should be on ensuring traditional healthy 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 **Section 4.7** of the attached **Appendix 1**, for the Federation’s proposal for continued access.

**Page 15, para.1 (Catchment protection strategy; Priority classifications):** “*The objective is to preserve the high quality of this water by avoiding risks of contamination*”. See comments above in relation to **Page vii, para.1.**

**Page 15, para.9 (Catchment protection strategy; Protection zones) and Page 17, Fig. 4:** “*..it is recommended that the catchments be managed with Reservoir Protection Zones (RPZ).*” “*A RPZ is usually defined by a two kilometre buffer area around the top water level of the reservoir....*” “*The development of organized events within the RPZ will be opposed, and general public access to the area will be prohibited...*”.

**Figure 4 (page 17)** indicates that the RPZs as proposed would exclude activities from a gross area of approximately 118 sq km.

The Federation accepts it is necessary to avoid activities that involve direct contact with the water body, and that it is also prudent and consistent with “*best practice*” to maintain a safety buffer around drinking water sources until the necessary risk assessment work has been undertaken to establish appropriate levels of protection. 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 wide 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 notes that DoW’s WQPN36 of April 2006 (“Protecting Public Drinking Water Source Areas”) states that “*By-law changes are currently being consulted to allow the “two kilometre” limit to be defined in DWSPPs “up to two kilometres*”. That would allow the RPZs to be reduced in width. 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 the Serpentine dams/reservoirs in particular); 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).

See the attached **Appendix 1, 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 16, para.1 (Catchment protection strategy; Protection zones):** “*Existing activities will be reviewed for compliance with water quality protection objectives...*”.

This statement implies that existing activities have not already been reviewed for compliance as part of the draft Plan preparation process (including the pre-Plan Assessment, as per table on page vii, Stages 1 and 2). It may be that the ‘review’ process referred to in the statement is intended as a future activity only. If that is the case it would be appropriate to insert the word ‘*periodically*’, so that the phrase will read (in part): “*..will be **periodically** reviewed..*”

**Page 33, (Table 1, Research projects):** Research projects may include “*people remaining in the catchment for extended periods.*” “*The risk...is minimal due to low numbers..., management controls and the ease of education prior to activity...*” and “*Ensure education on water quality protection...prior to activity*”.

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. Organised bushwalking activities have in common with Research Projects some similar considerations for management which made Research Projects an “*Acceptable activity with conditions*” e.g. Similarly small numbers of people with a strong awareness of the importance of the protection of water quality. Organised 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.

**Page 34, (Table 1, Feral animals and their control):** “*Feral pigs create a large risk of...pathogens from shedding of faeces during wallowing.*”

Also **Page 40 (Table 1, Horse riding)** and **Page 41 (Table 1, Animal (dog) exercising):** “*..pathogen contamination from people and animals... in the catchment..*”

The Federation does not dispute that the above issues of water contamination by animals may be significant risks. The Plan makes no mention however of the risk also of “*pathogen contamination*” due to **native fauna**. Scientific research has shown that native fauna also excrete pathogens such as *Cryptosporidium sp.* in their faeces and thus may pose a similar 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).

Animals also 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 native fauna and decomposing animal carcasses in comparison 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? Also refer to request above in relation to **Page 7, para.4**.

**Pages 37-38, (Table 1, Camping):** “*Undesignated camping is prohibited in the catchment.*” “*..risk to water quality is increased considerably...due to the lack of proper facilities and the sites generally being close to the waterbody*”. “*Camping at undesignated sites is likely to involve additional risks...waste disposal... fishing and marroning*”. “*Undertake a recreation planning exercise to identify camping opportunities outside of the catchment area*”.

**Definition of “camping”?** - As in WRC Statewide Policy 13, Table1, for clarity ‘backpacking with overnight stays’ needs to be identified and differentiated from conventional “*camping*” activities (see also comments above re **Page 11, para.5**). In Policy 13, Table 1, these activities 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 overnight camping activities of organized bushwalkers.

**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 for its members to continue that activity under appropriate approvals and controls. 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. Their activities should therefore not be considered in the same category as direct ‘water-contact’ activities (such as “*fishing*” and “*marroning*”). Furthermore the two existing Bibbulmun Track designated campsites ‘service’ only a very small portion of the combined 690 sq km area of the Serpentine catchments. Without overnight stays, non-Bibbulmun Track bushwalkers would therefore be limited to day walks only, unless they were near the southern limit of the catchment where it might be possible to cross into the unrestricted Murray Basin, unlike the adjacent basins to the east and north which are also drinking water catchments.

Also refer to **Appendix 1, Section 4.7** which outlines the Federation’s proposal for bushwalking with overnight stays and includes the concept of ‘**temporary designated campsites**’ i.e. Sites suitable for overnight stays for organized bushwalking activities remote from the Bibbulmun Track and other tracks, and also away from the reservoir, water courses and RPZ. Recognition of ‘temporary designated campsites’ would not only allow our members continued access to the catchments for approved activities but could also provide the regulators with much-needed additional ‘eyes and ears’ within the remote parts of the catchment areas.

For example, Table 1 (page 38) states that “*undesigned camping is considered rare and the risks to water quality are minimized due to catchment surveillance by Water Corporation rangers*”. The assumption that perceived risks to water quality can be effectively minimized by that approach assumes that Water Corporation’s monitoring capability, particularly its human resources, are sufficient for surveillance across the more remote parts of the catchment areas. “*Undesignated camping*” is just as likely to occur in those areas as along the Bibbulmun Track. The Federation’s members are more likely to see or hear activities or events that could pose a threat to water quality (e.g. hazardous conduct such as poor bush hygiene, illegal off-road vehicle use, etc) that would otherwise go unnoticed in areas beyond the monitoring capability of Water Corporation. In that way our members could make a further contribution to minimizing risk within the catchments. The Federation and its membership have an obvious interest in protecting the environmental values of the areas we walk, including the water quality values of the catchment areas.

With regard to the Plan’s Recommended strategy to “*Undertake a recreation planning exercise to identify camping opportunities outside of the catchment area*”; The comments above re **Page 14, para.5** are also relevant here i.e. The recommended strategy is impracticable in relation to traditional organised bushwalking with overnight stays. Many of the best traditional bushwalking areas close to Perth are within the catchment areas. As above, also refer to **Section 4.7** of the attached **Appendix 1**, for the Federation’s proposal for continued access.

**Pages 38-39, (Table 1, Bushwalking and cycling):**

“*Acceptable activity with conditions*”. – See comments above re **Page viii, para.8**.

“*Undertake a recreation planning exercise to identify catchment bushwalking... opportunities*”. - The Federation supports this recommendation and trusts that DoW will also seek its active involvement in the recommended planning exercise.

“*Spread of forest diseases, particularly if individuals do not keep to tracks*”. – This issue is perhaps more relevant to DEC and appears to be somewhat out of context in a DWSP.

However, the Federation and its members are aware of their responsibilities not to inadvertently contribute to the spread of *Phytophthora* die-back disease. Our members are conscious that much of the Serpentine catchment lies within the 'Disease Risk Area'. They are educated to recognize and avoid areas affected by die-back and they take responsible precautions not to transport potentially affected soil on boots from one area to another and they also clean their boots when leaving an area. The risk from bushwalkers however must also be viewed in perspective, particularly considering the greater risk of transport of infected soil on forestry vehicles between areas during logging operations.

***“No further trails to be developed in the catchment without consultation...”***. - In relation to organised bushwalking, DoW needs to be aware that the Federation's members do not establish new **visible** tracks or trails where none existed before. Bushwalking does not have the potential to cause degradation and erosion such as is often associated with on- and off-track cycling activity. Most of the 'off-track' bushwalking areas within the catchments show no signs of worn trails despite many visits over many years by bushwalkers on organized activities. 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. (Refer also to the attached **Appendix 1, Section 3, Minimal impact**).

*“Bushwalking and cycling”* have been lumped together for convenience on Table 1 as a single land use/activity and jointly assigned a *“Medium management priority”*. This is unfortunate. They are recommended together as an *“Acceptable activity”*, but the 'lumping' may create an impression that the two very different activities share generally similar issues and risks. It is acknowledged on page 39 that *“Cycling...usually has a greater impact than walking because there is a large rate of return to areas....”*. However, for accuracy the word *“usually”* should be deleted from that phrase. It is potentially very misleading to imply that bushwalking may give rise to the types of degradation and erosion that may be caused by cycling. See also comments below re **Page 48** with regard to management priority.

The Federation submits that **Bushwalking** must be recognized as a separate Land Use/Activity and included separately from Cycling in Table 1. The Federation offers the following suggested content to insert into Table 1 (see next page) :

<b>Activity</b>	<b>Bushwalking, including backpacking with overnight stays.</b> <ul style="list-style-type: none"> <li>• Bibbulmun Track</li> <li>• Organised and informal activities away from the Bibbulmun Track.</li> </ul>
<b>Hazard</b>	Pathogen contamination from people remaining in the catchment for extended periods, including occasional overnight stays.
<b>Management priority</b>	Low
<b>Consideration for management</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Organised bushwalking groups are small and well managed.</li> <li>• Bushwalking does not involve contact with the water body and walkers are educated to stay out of, and away from, water courses.</li> <li>• Traditional ‘off-track’ bushwalking does not create new visible “trails” and does not contribute to turbidity.</li> <li>• ‘Off-track’ bushwalking routes cannot be followed by non-bushwalkers and individuals.</li> <li>• 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.</li> <li>• Low numbers and hygienic burial of human waste ensure minimal risk of pathogen contamination.</li> </ul>
<b>Current preventative measures</b>	<ul style="list-style-type: none"> <li>• Regular inspections of the Bibbulmun Track by catchment rangers.</li> <li>• Catchment surveillance by Water Corporation rangers.</li> </ul>
<b>Recommended protective strategies</b>	<p><i>Acceptable activity, with conditions.</i></p> <ul style="list-style-type: none"> <li>• 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 (<b>see note *1 below</b>).</li> <li>• Ensure acceptable activities occur only outside the RPZ.</li> <li>• 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.</li> <li>• No new formed trails to be developed in the catchment without consultation with relevant agencies.</li> <li>• 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.</li> <li>• Use signage and brochures to educate on the importance of protecting drinking water quality.</li> </ul>

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

**Page 39, (Table 1, Orienteering and Rogaining):** “people remaining in the catchment for extended periods, particularly close to the reservoir or tributaries.”

“Camping is frequently associated with rogaining..although campsites are usually outside of catchment areas.”

“Ensure approved groups use trails away from the reservoir and tributaries”.

“Ensure ....approval for events, and proper management is a condition of approval”.

“..run by organised groups can be managed through approval and education”.

“groups are very responsible and willingly promote water quality issues”.

“Low management priority”. “Acceptable activity with conditions”.

Similar to Research activities (see comments above re **Page 33**), DoW considers these activities are an “Acceptable activity with conditions”. 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. Organised bushwalking does not involve contact with the water body and walkers are educated to stay out of, and away from, water courses. See also comments above re **Pages 37-38 (Camping)** and **Pages 38-39 (Bushwalking and cycling)**.

The Federation therefore trusts that its proposals in the attached **Appendix 1, Section 4.7**, regarding the continuation of traditional bushwalking activities in the catchment will be accepted.

**Page 42, Table 1 (Picnicking):** “Picnicking is an acceptable activity at designated sites only.”  
“The risk... is increased by proximity to the reservoir or tributaries...”.

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 at ‘undesignated sites’

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 could usefully be applied in considering the activity of bushwalking with overnight stays in the broader catchment.

Also see comments above re **Page 12, para.1** which are also relevant here.

**Page 43, Table 1 (Recreational Hunting):** “Pathogen contamination from feral animal carcasses”. (See also comments above re **Page 34, Table1**). In the interests of risk identification and awareness, the risk from native animal carcasses should also be identified in the Table. Native animals (and carcasses) would be in greater numbers than feral pig carcasses. Kangaroo carcasses from road-kills along the Albany Highway are an example risk.

**Page 44, Table 1 (Motor rally events):** “It is recognised that rallies in the area 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 objectives” but “Existing events are acceptable with best management practices”.

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

**Page 48, (Table 1, Indigenous Cultural activities):** “Due to the relatively low numbers of people currently involved, indigenous cultural activities are not considered to pose a contamination risk in the catchment”. “Aboriginal cultural activities are minimal....”

Hazard: “The risks are those associated with public access”.

Management priority: “Low”

We note that in another current draft Plan (refer Canning River Catchment Draft DWSPP) the hazard is otherwise more specifically identified as: “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. Organized 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 and should have similarly “Low management priority”. Also see comments above under **Page 33 (Research Projects)** and **Page 38-39 (Bushwalking and cycling)**.

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 re **Page vii, para.1** are also relevant here.

**Page 53, paras.5 & 6 (Recommendations):**

Item 10. “Environmental management plans should be developed, implemented and audited for approved or organized recreational activities and events in the catchments”;

and Item 11. “Agencies should meet to discuss the development of a recreation plan for this catchment”.

Discussions should also be held with other stakeholders including the Federation to maintain and improve recreation opportunities in drinking water catchments. DoW has minimal ability to influence opportunities for recreation outside its own area of responsibility, being the catchments. Consequently in the best interests of the community, DoW’s focus should be on ensuring traditional healthy 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 1, Section 4.7** for the Federation’s current proposal.

DoW (and DEC) should also have senior representation on the current **Premier's Physical Activity Taskforce**. Those are the two 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 53 (Recommendations):** Additional Recommendations should be added as follows:

- 17 **Undertake more rigorous risk analysis of individual actual and potential activities within the proposed RPZs and the broader catchment. A specific plan and timetable for objective risk assessment should be prepared and made available to stakeholders.** 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.

- 18 **Review the necessity for an exclusion zone as wide as 2 km around the reservoirs and whether a significantly narrower zone would provide a sufficient protective 'buffer' and be in the broader community interest.**
-