

Mundaring Weir Catchment Draft DWSP (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. 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 15 January 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) and in Section 4.1 of the Plan which states (para.4): “*This Plan aims to balance water quality protection, and social needs and aspirations as much as possible*”.

Furthermore, we regard the short period originally set for public submissions on the Plan (15 January to 26 February 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 Mundaring Weir 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.

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, para.6).

It would be appropriate to also add in the “**Summary**” (page viii, para.6) that “*the catchment is popular for...[the various recreational activities mentioned]...including bushwalking, including along the Bibbulmun Track and within the broader catchment.*” The catchment area has high existing and future recreational potential for the bushwalking community.

An 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 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. Examples of popular traditional bushwalking areas for the Federation’s members within the catchment, aside from the Bibbulmun Track, include at least the following:

Mt Observation-Pony Hill, Mount Billy, Mount Yetar, Mount Gorrie, Upper Darkin, Qualen Road area, Christmas Tree Well area, Running Brook area, Mount Dale, Bartons Mill-Little Darkin, Manns Gully-Chinamans Gully area and Flynn area.

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.6**). 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 objectives” are “*risk avoidance, risk minimisation and risk management...*”. This points to possible 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 7, para.5, (Microbiological contaminants): “*Microbiological testing of raw water samples from the Mundaring reservoir has been conducted weekly since 1999 and at regular intervals prior to that year*” The Federation would welcome access to the data from the Water Corporation over the last few years from the Mundaring reservoir (and others) to independently interpret the existing evidence of risk from pathogens prior to treatment.

Page 8, para.6 (Microbiological contaminants): “*Catchment sampling ..has..yielded high thermotolerant coliform counts.*” Four sampling points are noted to have given particularly high results. In the interest of identifying key risks within the catchment and highlighting relative risks of different activities or land uses, it would be useful to more specifically identify the likely sources of the pathogens in those cases. Three of the four cases involve nearby rural land and grazing property suggesting livestock is the source. The fourth appears to be close to a rifle range, a motorcross circuit and a recreation ground, suggesting the source/s would likely be identifiable with closer study. The Federation submits that the risk to water quality from its members organised bushwalking activities are negligible compared to those identifiable risks.

Page 12, para.5 (Land use and contamination risk; Recreation): “*The Centre organises many group activities, including bushwalking. However...activities also occur throughout the catchment on an informal basis, without being part of an approved or organised group*”. This last statement is potentially misleading and requires rewording or clarification. It could suggest that activities within the broader catchment that are not organised by the Perth Hills National Park Centre are neither approved, nor organised. As recognised in the Summary (p.viii), bushwalking is an approved recreational activity within the catchment and the Federation’s members participate in very well organised group bushwalking activities within the catchment 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.

Page 13, bottom (Proposed land uses): Section 3.2 (and **Table 1**) should also mention the future potential impact on the catchment of the Worsley Bauxite Mining expansion plans north of the Brookton Highway of which DoW is presumably aware. (Refer to **Worsley Bauxite mining expansion Environmental Review and Management Programme (ERMP), May 2005**). The Worsley expansion plans may also impact on traditional bushwalking activities (including backpacking with overnight stays) within the catchment.

Page 15, para.4 (Catchment protection strategy; Protection objectives): “*This plan aims to balance water quality protection, and social needs and aspirations as much as possible.*” See comments above under Section II (Invitation to make a submission) .

Page 15, para.8 (Catchment protection strategy; Priority classifications): “*The objective.. is to protect water quality according to the principle of risk avoidance..*”. See comments above in relation to **Page vii, para.1.**

Page 17, para.2-3 (Catchment protection strategy; Protection zones) and Page 18, Fig. 4: “*..it is recommended that the catchment be managed with a Reservoir Protection Zone (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 would be opposed, and general public access to the area would be prohibited*”. “*Existing activities will be periodically reviewed for compliance...*”.

Figure 4 (page 18) indicates that the RPZ as proposed would exclude activities from an area of approximately 60 sq km (i.e. average 5 km width and 12 km long).

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 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 Mundaring Weir Reservoir 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).

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 22, (Table 1, Feral animal control): "*The major risk associated with feral animals is pathogen contamination.*"

The Plan makes no mention however of the risk of "*pathogen contamination*" due to **livestock (Page 36)** or **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 decomposing animal carcasses 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?

Page 24, (Table1): **Table 1** should also mention possible future **Bauxite Mining** within the catchment. See also comments above re **Page 13**.

Page 34, (Table 1, Research projects): Research projects may include "*people remaining in the catchment for extended periods.*" "*The risk posed is minimal as it is always undertaken with supervision and there are few people involved*". And "*ensure the people involved are aware of ...the importance of protecting drinking water quality*".

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 Best Management Practices*" e.g. Similarly small numbers of people with a strong awareness of the importance of the protection of water quality. 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 36, (Table 1, Private land, Livestock grazing): “Private land in the catchment...is mostly zoned for general farming..”. “..stock grazing and access to streams..”. “Existing land uses are acceptable with best management practices”. Management priority: “Medium”.

In another draft Plan “Farm animals and domestic animals” are noted to be a Hazard requiring “High” management priority which seems more appropriate given that such animals are a recognized source of “pathogen contamination”.

Page 38-39, (Table 1, Camping): “Designated campsites (including approved temporary campsites)...risks to water quality can be managed”. and “Undesignated campsites”. Unauthorised camping (outside of designated areas)... “..risk to water quality is increased considerably..due to the lack of adequate facilities and sites generally being close to waterbodies”. “Camping at undesignated sites is likely to involve additional risks...rubbish dumping, fishing and wildfire”. “Undertake a recreation planning exercise to identify camping opportunities within the catchment”. “Ensure permanent designated campsites are only in association with the Bibbulmun Track”....

Definition of “camping”? - It is unclear if the heading “Designated campsites including approved temporary campsites” is inclusive of approved “overnight stays” by bushwalkers within the catchment. 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 overnight camping activities of bushwalkers. Taking account of the distance from the water body, overnight stays outside of the RPZs and away from stream courses have minimal risk and should not be considered in the same category as direct ‘water-contact’ activities. For clarity, as in Policy 13, ‘backpacking with overnight stays’ should preferably be differentiated from conventional “camping” activities.

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. 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.

Also refer to **Appendix I, Section 4.7** which outlines the Federation’s proposal for bushwalking with overnight stays which includes the concept of ‘**temporary designated campsites**’. 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.

The Federation supports the recommendation for a “recreation planning exercise to identify camping opportunities within the catchment” and trusts that DoW will also seek its active involvement in the exercise.

Page 40, (Table 1, Authorised Bushwalking):

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

“Ensure organized groups obtain approval for events, and proper management of the group is a condition of approval”. - The Federation and its members would be pleased to cooperate with the development and implementation of a practical event approval process. 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.

“No further events or trails to be developed in the catchment without consultation...”. - In relation to bushwalking, DoW needs to be aware that the Federation’s members do not establish new **visible** tracks or trails where none existed before. 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. (Refer also to the attached **Appendix I, Section 3, Minimum impact**).

Page 44, (Table 1, Orienteering) and Page 53 (Table1, Rogaining): *“people being in the catchment, particularly in close proximity to waterbodies ...”. “..often camping..” “include the use of temporary campsites.” “Ensure all events and temporary campsites are outside the RPZ”. “Ensure approval for events with the condition of proper management”*.

Similar to Research activities (see comments above re **Page 34**), DoW considers these activities as *“Acceptable activities with controls”*. 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 **Page 38-39 (Camping)** and **Page 40 (Authorized Bushwalking)**.

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

Page 50, Table 1 (Picnicking): *“Picnicking is an acceptable activity, with conditions”. ...prohibit..other than at designated sites.” “The risk... is increased by ...sites...being in close 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.

Page 56, para.5 (Recommendations): “Agencies should meet to discuss the development of a recreation plan for this catchment. (All agencies to participate).”

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 **Fed. 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 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 56 (Recommendations): Additional Recommendations should be added as follows:

- 15 **Undertake more rigorous risk analysis of individual actual and potential activities within the proposed 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.**
-