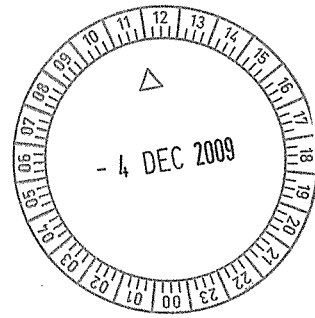


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30 November 2009

By email to cstephenson@parliament.wa.gov.au

Submission to Legislative Council Standing Committee on Public Administration Inquiry into Recreation Activities within Public Drinking Water Source Areas.

The Greens have welcomed the opportunity to submit comment on the Inquiry into Recreational Activities within Public Drinking Water Source Areas. The Greens are very concerned for a number of key public policy areas that are potentially affected by any change to existing access restrictions to drinking water source areas.

The Department of Water Statewide Policy Number 13 "Policy and Guidelines for Recreation within Public Drinking Water Source Areas on Crown Land 2003" provides a strong multiple barrier approach to protecting drinking water source quality. In some areas the Greens consider Policy 13 can become more proscriptive of access and use to ensure a far greater security of water quality for all end users of water.

The Greens are concerned that any easing of current restrictions on recreational and industrial access to Drinking Water Source Areas will lead to increased compromise of water quality, and may require bulk water providers to install massive water treatment infrastructure at taxpayer expense to cover any potential breach of water quality protocol. This cost will be borne by all water users yet affect low-income earners more than any other section of the community.

Worst case scenarios may see Drinking Water Source Areas being withdrawn from supply to the Integrated Water Supply Scheme and more pressure being applied to other sources of drinking water, particularly the Gnangara groundwater mound. This would result in large economic waste through stranded reservoir, water treatment, pumping and piping assets. The overwhelming scientific evidence from across Australia with regard to best practice in the management of drinking water source areas is to adopt a precautionary approach. Western Australia is regarded by water professionals across Australia as having the best management approach in the nation. The current approach should not be changed or weakened.

Management for multiple barriers to prevent degradation of water quality also has many potential positive impacts for biodiversity protection; management of weeds, feral animals and *Phytophthora cinnamomi*; carbon sequestration; and the creation of regional parks for all Western Australians. The attached submission provides our comments on the inquiry in more detail. We welcome further discussion on this submission.

Yours sincerely,

Hon Alison Xamon MLC
30 November 2009



Submission from Greens water spokesperson Hon Alison Xamon MLC

In making this submission The Greens considered available best practice across Australian jurisdictions. Of great import were two reports prepared by the Cooperative Research Centre for Water Quality and Treatment

- Research Report 24 Recreational Access to Drinking Water Catchments and Storages in Australia
- Research Report 29 Source Water Quality Assessment and the Management of Pathogens in Surface Catchments and Aquifers

The Committee will no doubt be aware of these reports and many more when reviewing all submissions made. Additionally the Australian Drinking Water Guidelines 1996/2004 provide strong peer reviewed scientific basis upon which to make risk assessments for drinking water source areas.

It is very important to consider the causes for calling for this inquiry particularly as certain recreation users groups are publicly stating that it has been brought about by the results of their own persistent lobbying. The majority of drinking water source areas are surface water catchments located in the northern jarrah forests, and groundwater sources in areas of *Banksia sp.* bushland and wetlands in Jandakot and Gnangara. This Inquiry has the opportunity to place large scale regional planning to ensure that drinking water source areas remain covered by stringent exclusion policies.

Human activities in drinking water catchments severely compromises water quality. There is increased sedimentation from erosion, new tracks, dieback spread, and weed dispersal. This allows nutrients and faecal contaminants to be easily introduced to drinking water. Such a vector of disease transmission is scientifically proven and politically unwise.

The distance from drinking water sources to delivery areas is also a crucial factor to consider. As distances increase so does the costs of treating and pumping that water. As the footprint of Perth's urban form is steadily expanding, the distances from suburban areas to drinking water source areas are decreasing. This is placing ever more pressure for access to areas that have traditionally not been open to recreational use.

This increased pressure is coupled with increased promotion of active recreation as a lifestyle choice such as four wheel driving, trail bike riding, kayaking, canoeing, bushwalking, mountain biking; a coordinated approach is required to ensure the long term protection of drinking water sources from harmful activities. While physical activity delivers increased and better public health outcomes for physical and mental health, the values of undisturbed areas do need protecting from potentially harmful uses. Generally these activities are largely unregulated – for instance there is no requirement to ensure off-road vehicles such as trail bikes or kayaks are safe for users or are required to be registered. They are currently sold as an off-the-shelf item, with little or no oversight for training or education in responsible use. Neither are there clearly defined maps of approved areas for such recreational activity.

The Greens have a long standing policy to rapidly phase out open cut mining in State Forests and Reserves, including bauxite mining in the northern Jarrah forest and mineral sands mining on the Whicher Scarp. Although this issue is outside of the terms of reference for this committee, the mere fact that bauxite mining is tolerated under various State Agreement Acts should not be viewed as an opportunity for further damaging activities to be permitted within catchments.

Similarly, the forestry operations of the Forest Products Commission in drinking water source areas run contrary to the best practice position to immediately end all forestry logging and thinning practices in WA native forests and woodlands.

All water sources must intrinsically be managed for multiple outcomes: including drinking water quality, biodiversity protection, public recreation, and scientific research. In addition the Greens are very concerned for the multitude of chemicals that are required to bring drinking water quality to deliver public health outcomes. Any collapse to the current multiple barrier approach currently existing across the majority of WA's drinking water source areas would mean expensive water treatments that would dramatically increase risk for public health outcomes. Drinking water sources must have a higher level of risk assessment than for other water sources such as for irrigation water. As such drinking water source areas should be managed on the basis of risk avoidance.

Strong management protocols must be based on risk assessment and risk management. The highest precautionary approach should be adopted to avoid any compromise of the catchment where drinking water is sourced.

Essentially there should be no direct contact between humans and drinking water source areas. Land and water based recreation activities within Reservoir Protection Zones should be prohibited. Access to water bodies and groundwater areas should be restricted by a strong management scheme. Identification of existing recreational activities should be continually assessed for usage and maintenance and cumulative impact.

Recommendation One

Existing Statewide policy 13 guidelines and management regimes should be maintained and enhanced to provide strong disincentives to damaging uses within catchments.

Recommendation Two

Public drinking water source areas should be managed for water quality and biodiversity management outcomes.

Recommendation Three

Responsibility for management of water source areas should reside within the Department of Water.

Recommendation Four

Separating human activities from public drinking water sources protects public health. Based upon Table 1 Water and Rivers Commission Statewide policy 13 Policy and guidelines for recreation within Public Drinking Water Source Areas on Crown Land. (pp. 8 – 10)

The Greens support all guidelines of the Statewide Policy 13 except for:

Land based activity

Activity	Reservoir Protection Zone	Groundwater wellhead	Proclaimed P1 DWSPA	Proposed P1 DWSPA
Rally and racing (established and proposed)	Incompatible (no exceptions)	Incompatible (no exceptions)	Incompatible	Incompatible

Water based activity

Activity	Reservoir Protection Zone	Proclaimed P1 DWSPA	Proposed P1 DWSPA
Boating	Incompatible (no exceptions)	Incompatible	Incompatible

Recommendation Five

Protective surveillance should be maintained and enhanced to ensure water quality is not compromised.

Recommendation Six

Dieback control and research need a dramatic increase in funding to protect the northern Jarrah forests and Banksia sp. woodlands. Weed control and the impacts of feral animals need further research and funds for implementation of management strategies.

Recommendation Seven

Industrial uses of drinking water source areas should be immediately curtailed. Bauxite mining and forestry operations within drinking water source catchments should immediately cease.

Recommendation Eight

The existing restriction on activities within two kilometres of the drinking water source surface water body be retained. The Reservoir Protection Zone provides a solid and clearly identifiable notice of the boundary of change in use.

Recommendation Nine

Areas for human recreational activities should be identified by a clear scoping strategy that takes into account the existing and strengthened Statewide Policy 13 guidelines. This scoping strategy should consider the areas from Jurien Bay, Wongan Hills, Kellerberrin, Narrogin, Kojonup, Manjimup to Augusta.

Recommendation Ten

Areas identified in the scoping strategy should be identified as potential hubs for recreation activities and managed according to a differential protection strategy.

P1 and proposed P1 areas should be managed according to risk avoidance as identified under the existing Statewide Policy.

P2 and proposed P2 areas should be managed according to risk minimisation as identified under the existing Statewide Policy.

Recommendation Eleven

The recreational trail bike industry is in dire need of regulation and surveillance. All off-road vehicles should be required to purchase and maintain a license and to ensure the vehicle meets basic safety standards. Commensurate with this, areas should be identified in areas close to population centres where trail-bike activities can be directed. The Greens submission regarding the Gngarara

Sustainability Strategy did support the provision of an Off-road vehicle and trail bike area in a constrained area of the Gngara Pine Plantation.

Recommendation Twelve

Public education on the importance of strictly quarantined areas in order to protect public health and biodiversity conservation should form part of State curriculum at Primary, Secondary and Tertiary education.

Recommendation Thirteen

Water quality should be constantly monitored at every stage of the water production process to ensure compromises in potentially detrimental public health outcomes are immediately highlighted and appropriate measures are invoked to determine the causes.