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South Yunderup 6208

Friends of Rivers, Peel .Inc

November 23, 2007

Chairman of Environmental Protection Authority
Peel Harvey Water Quality Improvement Plan Submission
Locked Bag 33
Cloisters Square Perth WA 6850

Dear Sir,

I am writing on behalf of Friends of Rivers, Peel in response to our receipt of the Draft Water Quality Improvement Plan for the Rivers and Estuary of the Peel-Harvey System.

In accordance with the submission summary attached the following are of concern to our organization:-

Section 4 page 5 Connect all existing homes to infill sewerage system.

Friends of Rivers, Peel fully endorses and supports this proposal, we doubt that Water Corp and their political masters have the political will to maximize the benefits of this proposal. Our organization has been requesting that Water Corp meet its social responsibilities and act in accordance with their regulations in enforcing connection of residential and commercial properties to available reticulated sewerage system since 2002. Please see enclosed copies of letters from, The Premier, The Minister for Health, The Minister for Water and The Minister for the Environment that indicate their lack of endeavor in regard to this point. Please visit www.forpeel.org for further information re septic tank impact on the Serpentine and Murray Rivers.

Section 6 page 6 Improve other agricultural practices to reduce phosphorous discharge.

At a soils workshop in Waroona in 2007 that was significant by the number of landowners who did not attend it was shown that the PH levels in the sub soils of the Peel Harvey catchment area are deemed to be low. It was explained that regardless of how much phosphorous fertilizer was applied per acre that once the phosphorous penetrated the low Ph sub soil that it was immediately lost and discharged into the ground water system. It is our opinion that the landowners are not aware of this and that a soil sampling/soil profiling programme be put in place so that rural landowners understand the soil profile and the necessity to have a well balanced soil with compatible ph levels for crop and pasture production. Without the correct balance the addition of fertilizers can create a negative growth effect and environmental damage.

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Section 12 page 7 Improve the agricultural and urban drainage system.

Nutrient migration via drains is significant but Water Corp is not required to manage drainage for water quality improvement, simply water conveyance. Through a recent advertised amendment to their operating licence (operating lic No 32) they want to use a 1977 document as the guidelines for drainage for the future, this does not take into account the water quality in drainage. The proposed changes also included an amendment to remove the Serpentine River levees from the flood protection work list but no reason or consultation was provided to justify both of the above changes. The licence will still require compliance with the 72 hour rule for the Serpentine area which we understand was put in place for the potato farmers who no longer exist. These drains will remain unnecessarily large transferring more nutrients into the Peel waterways. We believe that the 72 hour rule should be removed and that the drainage rate be slowed down to allow for nutrient uptake by existing vegetation and that nutrient stripping reeds be planted in the drains to improve the water quality entering into the Peel system. What has been achieved at Lake Macquarie in NSW by diversion and slowing down the drainage along with nutrient removal is significant and could be a worthwhile model to use as a guide for the Peel region.

One area that the draft document does not cover is that of government agency co operation and understanding of the impact that they can have on achieving the proposed target of reducing the phosphorous levels from 145 tonnes to 75 tonnes per year.

An example of this is the property known as Amarillo Farm located within the City of Rockingham. This area is owned by Homes West and is the site of a proposed major urban development. The farm is currently leased to a farmer who is running cattle on the property. These cattle are allowed to graze in and around the Serpentine River and subsequently their faeces enters the waterways contributing to the nutrient levels. We would also suggest that the farmer would be applying fertilizer of various quantities to enhance the pasture to sustain his cattle. Did Homes West place any restrictions on the lessee that would benefit the Serpentine River when the property was leased? We think not.

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Friends of Rivers, Peel fully supports the 12 proposed plans of action but has reservations concerning the willingness of the government agencies involved to embrace the plans and work together for the common good to achieve the goals of the Plan. This point was raised with Minister David Templeman when we met on the 3rd of May 2007

Sincerely,

Colin Elton

Chairperson

Friends of Rivers, Peel Inc

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