From: Personal information
Sent: Tuesday, 13 January 2015 5:06 PM
To: Glennon, Chris
Subject: further comments on NSW fishing changes re Yabby nets in Googong

Hello Chris,
Thankyou for the opportunity to have further input into providing the ACT Government with ACTEW Waters' perspective on changes to permitted activities in Googong reservoir.

As ACTEW Water understand it, the NSW Government's contention is that the introduction of yabby nets will have no net change in risk to raw water quality from the Googong reservoir. Risk is comprised of two factors being likelihood and consequence. The consequence of pathogen contamination in potable water is serious, resulting in hospitalisation and potential death. ACTEW Water provide potable water sourced from Googong reservoir to the entire community including people who are immune-compromised, the very young and elderly so these potential consequences are realistic and the reason a water utility take such serious consideration in ensuring the safety, security and quality of its supply chain. ACTEW Water employ a multi-barrier approach to this supply chain, in which the first step is catchment management. ACTEW Water expend considerable resources in understanding and control risk across the supply chain. Permitting the introduction of yabby nets is an additional, and as such unassessed risk.

The likelihood that pathogen counts exceed treatment capability and health guidelines is unknown. As ACTEW Water are not industry experts on behaviour of fisherpersons and have no evidential basis of bait type or pathogen generation in yabby traps, we are relying on anecdotal evidence. We ask NSW fisheries to share how they have considered incremental pathogen contamination of a potable water supply into their risk assessment and what level of activity they anticipate could occur to ensure no net change in risk?

A water utility scales its treatment processes based on known raw water quality. A permanent incremental increase in pathogenic contamination beyond a treatment plant's capacity would require ACTEW Water to make substantial investment in the installation of a tertiary level of treatment requiring additional capital and operational expenditure to the ACT.

The Australian Drinking Water Guidelines (compliance with which forms one of the operational licence requirements for water supply in the ACT) is preparing to introduce health based targets for microbial drinking water quality. The proposed methodology considers the performance of the Water Treatment Plant in relation to the condition of the catchment. ACTEW Water have applied this methodology in conjunction to many years of actual water quality data from the Googong reservoir. The introduction of new activities, such as yabby nets, has the potential to increase the pathogen load, therefore shifting the condition score of the catchment in relation to the water treatment capability (hence making the water potentially 'less safe'). A comprehensive risk assessment would determine the potential additional pathogen load resulting from the baiting and deployment of yabby nets.

ACTEW Water take advantage of the natural pathogenic attrition due to detention time within the reservoir. The deliberate introduction of pathogenic contaminants at this point of the supply chain potentially negates the effect of detention. The turn around time on laboratory pathogen analysis is 24hours. The pathogen load is not known until after abstraction but is estimated from trending results.

Current fishing and recreation activities within Googong are heavily controlled and prohibit any body contact with the water. The enforcement of compliance with these rules are a factor ACTEW consider when assessing the controls at this point in the potable water supply chain. Anecdotal evidence suggests deployment of yabby nets requires body contact with the water.

ACTEW Water have actively invested resources and money into addressing the potential contaminant sources from the open catchment. ACTEW Water have over the last 5 years worked with local landholders in the supply catchment in order to raise the awareness of pathogenic contamination to the water ways. ACTEW Water have funded a comprehensive audit and rectification program of all onsite sewage management systems in this catchment. More than 145 landholders have undertaken training and industry accredited education programs ACT drinking water catchments. Landholders have been funded to fence cattle out of creeklines through 10 year contractual arrangements. Restoration and bank stabilisation works have also been rolled out in this catchment.

Regards,

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