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Comments on the Draft Derbal Yiragan (Swan) Djarlgarro (Canning) River Protection Strategy

YOUR DETAILS		
Please select one of the below*		
<input checked="" type="checkbox"/> A) I am submitting on behalf of an organisation or agency		
<input type="checkbox"/> B) I am submitting on my own behalf, but have an association with an organisation or agency		
<input type="checkbox"/> C) I am submitting on my own behalf		
If you selected A or B, please specify the organisation or agency*		
Urban Bushland Council WA Inc (UBC) The UBC is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity. https://www.bushlandperth.org.au/ . We are a voluntary community association with an active membership of more than 90 volunteer groups (each with their own local membership from 10-165 individuals) and more than 100 individual ‘supporter’ members – all with a common interest in conservation and protection of areas of urban bushland in WA. UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our ‘Friends Groups’ and their many volunteers – from all walks of life ‘working’ to improve and maintain the health of patches of neighbourhood nature – including 39 member groups with direct connection to Derbal Yiragan – Djarlgarro foreshores, wetlands or damplands.		
If you selected A, please provide at least one contact name and email for this submission. You are welcome to provide the names of all staff/members from within your agency/organisation that support or have contributed to the submission.		
Christine Richardson – Chair Sue Conlan - Vice Chair ubc@bushlandperth.org.au		
Did you participate in the community survey held between December 2023 to January 2024?		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Don't know

Comments on the Draft River Protection Strategy

This section of the form allows you to provide feedback on the Draft RPS.

COMMENTS ON THE DRAFT RIVER PROTECTION STRATEGY

What level of detail would you like to provide on the Draft RPS?

- Provide general feedback on the overall Draft RPS (**one question**).
- Provide comment on specific parts of the Draft RPS. This will involve answering questions that correlate to each content heading in the RPS. You can also provide general feedback (**24 questions in total**).

GENERAL FEEDBACK

Please provide feedback below

The Urban Bushland Council (UBC) and member groups are most appreciative for the opportunities to have contributed to the formation of this draft strategy by way of public consultation.

There are many UBC volunteer bushcare and urban landcare groups that are making a real difference to the protection and regeneration of natural areas along the Perth and Canning Rivers, tributaries, wetlands and catchment areas.

UBC congratulates the Swan River Trust (SRT) and Department of Biodiversity, Conservation and Attractions (DBCA) teams for this easy to read, comprehensive assessment of threats and a foundational focus on how to respect and protect our Perth Rivers. In particular, the focus of the importance of the following:

1. Recognition of 4 values for a healthy river system:

- **Objective 1: Catchment**
- **Objective 2: Water**
- **Objective 3: Biodiversity, and**
- **Objective 4: Foreshore.**

This order must prioritise effort and allocation of future resources.

2. Maintaining 'a healthy river system – will provide for nature and then 'healthy people'

3. Acknowledging Aboriginal culture and applying Noongar knowledge

- Waterways are intrinsic to Aboriginal culture and survival. Their **respect for elders and lore** was the key to preserving the health and productivity of the river for thousands of years of continuous survival. We support this endeavour that everyone accept and respect their culture and knowledge.

4. Issues and Threats are well described.

- **Clearing in the catchments produces the biggest impact on the health of the Swan Canning River System**, exacerbates climate change and decreases liveability
- **Non withstanding recognition that our biggest detrimental threat is from clearing in the catchments**, clearing is still continuing without sufficient measures to counterbalance the ecological impacts on the Swan Canning River System. Examples of extensive clearing occurring &/or having occurred in catchment areas include:
 - a. Perth Airport expansion of infrastructure and surrounding commercial premises, in particular Factory Outlets.
- Metronet housing corridor to Ellenbrook has seen a drop of canopy cover in the City of Swan from 33.5% in 2012 to 12% in 2020. Replacing natural areas with buildings and hard-stand is causing flooding and altering water flow to tributaries, rivers and groundwater, to detrimental effect.

- Maddington Industrial Park (MKSEA) stages of development continue with significant and projected offsite hydrogeological impact to the unique ecosystem of the Greater Brixton Street Wetlands and ultimately the Swan Canning Rivers).

UBC remains concerned that:

1. **The Swan Canning Rivers Management Act 2026 needs to be amended to reflect the current management responsibilities and power.**
2. **The key focus for actions in this strategy is on the SYMPTONS not the CAUSES** (eg the causes are clearing in the catchment, misalignment of planning policies /procedures, environmental impact assessment allowing for development, and lack of resources for the protection and conservation management of the SCRS).
3. **The geographic focus for actions is limited to the water and foreshores of the Swan and Canning Rivers** – even though the document provides a clear understanding that it is an interconnected system, with actions in the catchment affecting the above and below ground movement of water.
4. **The goals (p7) are not SMART** Specific, Measurable, Attainable (without resources), Relevant (to the wider catchment) nor Time-based/Timely.
5. **The Swan Estuary Management Park (SEMP) has been omitted.** As highlighted by UBC member group, the Swan Estuary Reserves Action Group (SERAG), the SEMP is one of the most important areas of *critical habitat, wildlife refuges and sanctuary areas for biodiversity in the river system*, and therefore should be specifically included and its protection planned for in this RPS. In addition, a key strategy should be the fencing of the three SEMP sites and exclusion of people except for management.
6. **Environmental vandalism by people wanting uninterrupted views** needs to be included in threats.

IF YOU WISH TO PROVIDE FEEDBACK ON INDIVIDUAL PARTS OF THE DRAFT RPS PLEASE PROCEED TO THE FOLLOWING PAGE.

Feedback on individual parts of the Draft RPS

Please provide comments underneath the relevant content headings. If you have no comment under a section, please leave blank and move on to the next section.

STRATEGIC GOALS

Page 7 of the Draft RPS

GOAL 1

Is what has been used to underly the RPS. Should it still be included here as a Goal?

All GOALS that then lead to OBJECTIVES, STRATEGIES and MANAGEMENT TARGETS and should be constructed as SMART GOALS,

Goal 6

The Draft RPS has provided a very impressive assessment of IMPACTS of CLIMATE CHANGE (p16-17) and THREATS (p18-19) that inform us that we don't have the luxury of trialling approaches for 10 years. We have significant scientific knowledge to guide our actions now – including no more clearing across the catchments.

THE DERBAL YIRAGAN (SWAN) DJARLGARRO (CANNING) RIVER SYSTEM

Pages 10-13 of the Draft RPS

Clear explanations of the Swan Canning River System that incorporates all the tributaries as well as any water movements around the catchments (above and below ground).

A fabulous reminder that the lands we all live, work, recreate, volunteer on are all interconnected. Graphics also cleverly present this information for people for whom graphics are critical to their best way of understanding / learning.

KEY ISSUES AND THREATS

Pages 15-19 of the Draft RPS

An impressive summary of issues and threats as well as a startling and necessary reminder that much of what we do on private and public lands (including fertiliser application, road run-off, clearing, reducing tree canopy, increasing 'hard stand', rehabilitating foreshore areas) – all have a significant impact off-site and 'down catchment'.

The stark prediction of population growth and the associated 'increasing demands for use of the rivers and their foreshores and more urban and rural developments through the catchments are placing increased pressure on the river system' (p15) highlights the urgency of even better conservation management of our extended waterways – and associated community education.

THE SWAN AND CANNING RIVERS MANAGEMENT ACT 2006

The Swan and Canning Rivers Management Act 2006 and Key legislative management areas

Page 21 of the Draft RPS

Important to see the refocus that 'Land and water management practises of the surrounding and outer catchments directly influence the water quality in the river system'

Guiding principles of the SCRM Act

Pages 22-23 of the Draft RPS

UBC understands that these guiding principles are part of the SCRM Act and has assumed that review and/or alteration has not been considered in this RPS. As above, UBC believes that the SCRM Act needs to be reviewed, including to reflect the altered management role of the Swan River Trust. UBC Supports the guiding principles including 'sound environmental practices and procedures being adopted'; precautionary principle 'where threats of serious or irreversible environmental damage' should be acted on.

Our concern is that these principles are often not applied – eg the clearing of Banksia Woodland Threatened Ecological Communities – that also have downstream negative impacts of the wetlands and river system.

Derbal Yiragan (Swan) Djarlgarro (Canning) river system planning framework

Page 24 of the Draft RPS

Again, a clear explanation (with graphic) to demonstrate the hierarchy of planning as well as the complex layers of legislation that 'have defined roles and responsibilities for the protection of the river system.

'PROTECTION' should be the overarching responsibility.

The current ecological health of the Swan Canning River System highlights that the current application of legislation and associated policies, procedures, management and action plans is not adequate to protect the environment. Our environmental and planning laws are failing the river. If we continue without change, we will be making token efforts.

UBC supports SERAG's observation that the 'Swan Estuary Marine Park Management Plan' should be specifically mentioned under Strategic Documents: with the following rewording so as to emphasise its fundamental importance as a nursery ground to the health of the whole Lower Estuary and to the sustainability of bird life, fish and crustacean life and thereby of dolphins and other river wildlife. SERAG's suggestion is in italics.

"The River Protection Strategy provides a strategic, coordinated approach to the management of the catchment area, DCA and the Riverpark and is designed to protect and enhance the ecological health of the river system, and promotes the benefits and amenities it provides to the community. *The Swan Estuary Marine Park Management Plan together with other management programmes and strategic documents provide objectives ... etc*

COLLABORATION IS KEY

Pages 25 to 27 of the Draft RPS

Whilst 'collaboration is key', without clear management responsibilities and associated adequate and sustained resources we will not be able to improve and maintain the ecological health of our River System.

Recognition of 'subregional groups in the Perth NRM region' as well as 'Local Governments' is import.

UBC however is concerned about the reference to LGAs role in 'maintain the balance between recreation use, development and ecosystem health'.

- Firstly, the order should be changed to highlight that 'ecosystem health' is the primary objective.
- Secondly, UBC believes that 'balance' is an overused term that may have been appropriate 25 years ago. Its use in 2024 pays little recognition to the absolute loss of our ecosystems since 2000 and that we should be focussing on 'restoring the balance towards nature'. Consequently, we believe more 'weight' should be given to 'ecosystem health'.

VISION, VALUES, ENABLERS AND STRATEGY FRAMEWORK

Vision

Page 28 of the Draft RPS

Vision is clear and puts the onus on nature 'needing to be cared for'.

Values and enablers

Pages 28 to 29 of the Draft RPS

Healthy river system – clear articulation of importance and need to maintain the four values of catchment, water, biodiversity and foreshore. However, even here the focus is 'for people', not for the intrinsic value of nature?

Strategy framework

Page 29 of the Draft RPS

Does the term 'values' need to be included in the graphic? It seems redundant.

HEALTHY RIVER SYSTEM

Catchment Pages 32 to 35 of the Draft RPS
Objective 1 Strongly support. Important to see this as the lead Objective.
Water Pages 36 to 37 of the Draft RPS
Objective 2 Strongly support.
Biodiversity Pages 38 to 40 of the Draft RPS
Objective 3 <ol style="list-style-type: none"> 1) Collaboration with Department of Fire and Emergency Services (DFES) is a gap in the RPS. DFES require LGA's to have 5m spaces between tree canopies which means we will never meet the goals of the Urban Forest Strategies or this RPS. <ul style="list-style-type: none"> • Acknowledgement of the fire threat of grassy weeds and unofficial tracks in bush reserves may help prioritise restoration work in the DCA, Objective 3. This would improve biodiversity, filtration and erosion from unofficial paths causing water to run down these paths and not wet the banks. Eg Mosman Park, North Fremantle and Point Walter/ Blackwall Reach. Rock walls do not support wading birds. • Pg 40 Seagrass: query if Rocky Bay is an accurate location on pie chart? It is most likely Point Roe. A seagrass study with exclusion pen was installed to research the time required for regrowth. • Strategy 14 increase in revegetation of foreshore – lack of clarity in target. <ul style="list-style-type: none"> • At least 10% restored! Does that mean 10% more or 10% altogether? • Is there a map of priority restoration areas? Will it be where volunteer groups are based? • Will fences be used to stop trampling foreshore vegetation? Volunteers want and need support of their work and not appeasement of uninformed users who think they have the right to walk everywhere. In addition to fences, signs, penalties and patrols must also be used. • SCRS acknowledges incorporation of nature-positive design that supports ecosystem biodiversity. It is a priority.
Foreshore Page 41 of the Draft RPS
Objective 4 – Foreshore Concern about what is implied by 'enhanced'. If this objective is focussing on contributing (along with Objectives 1-3) to a 'Healthy river system' then there should be no need for 'enhancement'.

HEALTHY PEOPLE
Lifestyle Page 43 of the Draft RPS
Objective 5 Lifestyle <ul style="list-style-type: none"> • The order of this objective needs to be swapped with Objective 7. We need to change the way we see the river as expendable. Our lifestyles need to change so that caring for the river is a priority. • A strategy here needs to be to move the bike paths and walk trails back from the foreshore so birds and other animals can be undisturbed. Melville foreshore is a prime example. • Building more infrastructure in foreshore reserve leaves less room for meeting canopy cover targets. Need to design shelters or shaded areas for picnics that can be almost 100% canopy covered with trees. • Paths can be a way of keeping people on tracks so as not to cause degradation. Paths that are shaded can be used all year round and add more health benefits.

Culture

Page 45 of the Draft RPS

Objective 6 Culture

Agree that mapping of sites is important. Too late for most.

- How will knowledge holders know when to have a say? DBCA already had a spoken library / yarning time of Noongar sites around the river, yet the recently installed 'Point Walter bike pump station' went ahead in this most important birthing site, with an incredible dreamtime story that identified the area for everyone.

Connection to nature

Pages 46 to 47 of the Draft RPS

Objective 7 Nature and our well being

This objective needs higher priority than 7. UBC recommends it is swapped with position of Objective so that 'connection with nature' has a higher priority than enhance lifestyle. A healthy river for healthy people.

- Importance of planning areas that can't be disturbed and green infrastructure. Nature needs space!
- It should be clear that only certain people have access to protected, low disturbance areas for maintenance and they should consider volunteering with the group looking after it.
- The increased revegetation of the foreshore areas by volunteer groups and LGAs is seeing more people using the shared paths benefiting from their use.

ENABLERS

Sustainable resourcing

Page 49 of the Draft RPS

Objective 8 Sustainable funding

Adequate and sustained resourcing is critical to maintenance of the Derbal Yiragan Djarlgarro. It requires the WA State Government to allocate appropriate and significant recurrent budget and resources.

Priority is to stop degradation and costs will increase with inaction. There should be no delay in action which extends to planning in the catchments, including:

- Ensure new industrial and urban developments will not impact on Swan Canning River ecosystem health.
- Support volunteer groups revegetating the river systems as well as the land managers (eg DBCA, LGAs).

Collaboration

Page 50 of the Draft RPS

Objective 9 Collaboration

- Needs to be highest priority with planning changes necessary.
- Cost of inaction may be irreversible.
- Well described here but could be prioritised in order of threats.

Collaboration strategies needed to protect the Swan Canning Rivers are:

- **Catchments:**
 - Collaboration at a State and local government level is essential.
 - Development and project ideas are initiated at both State and Local Government levels and appear to well down the planning pathway before impact to the receiving environment is considered. This leads to inadequate assessment of ecological changes to surroundings with little or no regard of the impact to the rivers systems especially if the development is out of sight to wetlands and watercourses. Protection of the environment needs to be prioritised.
 -

- **Collaboration with land managers**

- **LGA Public Open Space strategies in foreshore (DCA) areas.** It appears to conservationists that it is the LGA **planning team who write the POS (Public Open Space) strategies for the SCR DCA's** without consultation with the LG environment teams Management Plans or regard for the DBCA SCRPP. This needs to be addressed. DBCA needs to sign off on POS strategies in DCA and catchment areas. Although DBCA may sign off on proposals for infrastructure in DCA areas, once the LGA POS is made public, it is the public's expectation that POS suggestions will be enacted.
- It may be more strategic that DCA land needs LG management plans to address the key objectives of the healthy river system especially in their public open space strategies.
- Request that the few places that water birds especially migratory birds are nesting should be excluded from people and dogs. Signs should be seen from water (boats, canoes) and onshore. This will be more important as foreshore is lost to climate change impacts, ie water rise, rock walls.

Policy and Planning

Page 51 of the Draft RPS

Objective 10 Planning and Regulation

- Critical changes needed as our planning and regulations are failing our river systems. Cumulative impacts are inadequately assessed.
- Addressing climate change is urgent and can be used to enforce planning policies. This objective needs greater priority as it enables enforcement and drives direction for all other objectives.

Strategies needed to protect the Swan Canning Rivers are:

b. Cumulative Environmental Impact Assessment (CEIA)

- MRS amendments and Local Planning Scheme amendments needs at least a basic consideration.
- Early planning processes need to assess cumulative environmental impacts to waterways of all projects at a State and Local Government level.
- Assessment of one project needs to consider current and proposed developments as best that can be achieved for a true assessment.
- We note that the EPA are currently developing guidance for Cumulative Impact Assessment and propose that any guidance here should be consistent with that.

Objective 11

- Agree research important and public reporting essential.

MANAGEMENT TARGETS

Page 32-52 of the Draft RPS

UBC is highly concerned that the majority of the MANAGEMENT TARGETS for the 11 OBJECTIVES and associated 37 STRATEGIES have no measures – they are broad and motherhood.

How can we determine ASAP how we are tracking with our protection of the Swan Canning River Systems and make the necessary changes to management?

IMPLEMENTATION AND EVALUATION

Page 53 of the Draft RPS

This one page informs of a significant body of work to prepare a management plan that delivers on the RPS? Is this the intent? What delays are we anticipating during which time the ecological health of the River System will continue to decline.

SECTION 13: APPENDIX 1 - LEGISLATION APPLICABLE TO THE RIVER SYSTEM

Pages 54 to 59 of the Draft RPS

Again, very impressive and useful. This easy to understand 3 pager could be extended beyond the RPS to assist land manager and land users to understand the importance of active and dedicated river system protections as well as the interconnectedness of legislation.

Conclusion:

- The draft provides clear and comprehensive:
 - explanations of the River System, its interconnectedness both above and below ground
 - examination of key issues and threats
 - highlighting of the complexity of the planning and environmental frameworks with defined roles and responsibilities for River System protection and management.
- The draft focuses on the SYMPTOMS rather than the CAUSES of environmental degradation, with clearing in the catchment being the greatest detrimental impact. The current ecological health of the Swan Canning River System highlights that the current application of legislation and associated policies, procedures, management and action plans is not adequate to protect the environment. Our environmental and planning laws are failing the River System.
- The status of the RPS needs to be asserted, such that policies and management plans that impact on the River System are aligned (eg public open space management by Local Government Authorities).
- Whilst the draft is very clear about the interconnectedness across the catchments – the focus still remains ‘the foreshores of Swan-Canning and their tributaries’ – again which in many cases is tackling the symptoms, not the causes.
- Adequate and sustained resources are key to improving the ecological health of the RPS – on which all the other values rely including ‘lifestyle’.
- Collaboration is critical as is management responsibility - and lack of both exacerbating the decline in the health of the river system.
- Agree that we need to act fast to address impacts of climate change. However, this objective needs to be much higher and give direction for priorities.

Yours sincerely

Chairperson
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Some of our Derbal Yiragan (Swan) Djarlgarro (Canning) River System URBAN TREASURES....

EXTRACTS: <https://www.bushlandperth.org.au/treasures/>



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Ashfield Flats – Bush Forever Site 214 [Photo: John Baas]



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Mosman Park – Bush Forever Sites 334 & 335 [Photos: John Baas]



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The Spectacles – Bush Forever Site 269 [Photo: Friends of The Spectacles]

CRREPA volunteers weeding the Shelley-Rossmoyne Foreshore [Photo: Sue Stanley]

