

Dear Parks Victoria (cc East Gippsland Shire),

14/12/2019

I have a number of queries in relation to the announced closure of the A.E.Lind swimming pool at the Buchan Caves Reserve, which Parks Victoria stated was due to the pool's failure to meet minimum standards under the *Public Health and Wellbeing Regulations 2009*. I fully understand that public health is paramount and should never be compromised. However, I believe that this surprise closure highlights some inconsistencies and inadequacies in the management response that warrant further consideration. These are as follows:

1. Why do the *Public Health and Wellbeing Regulations 2009* apply to the Buchan Caves pool but not to any other river pools in Victoria, including those managed by Parks Victoria? For example, the architecturally similar pool at Vaughan Springs in the Castlemaine Diggings National Heritage Park has had no such ban on swimming, despite it ceasing to flow every year for months at a time. Why has Parks Victoria singled out the Buchan Caves pool for application of these regulations, and why does the basis for not applying the regulations to all other river pools across Victoria not apply to the Buchan Caves pool? It could be argued that a more appropriate risk management approach in this on-river pool would be to apply the NHMRC *Guidelines for Managing Risks in Recreational Water*, rather than the *Public Health and Wellbeing Regulations 2009*, in which case the pool would probably remain open.

2. What monitoring has Parks Victoria undertaken to assess the real risks to human health at the pool? Water quality risks from swimming in Victoria are usually driven by two main risk factors: faecal contamination or algal blooms. In the Buchan Caves pool, where nutrient loads and water temperatures are very low, the risk of algal blooms would be negligible. If the ban on swimming is driven by the risk of faecal contamination, e.g. from swimmers, how has that risk been assessed? Does it take into account the lower use of the pool than most municipal pools, the lower likelihood of infants using the pool (due to its low water temperature), the effect of sunlight on the pool, and the beneficial effect of inflows from the cave? The risk of faecal contamination from stream inflows is likely to be very low (subject to confirmation by monitoring), given that the pool is from a cave fed stream with no agricultural activity upstream.

3. What options did Parks Victoria consider to keep this community asset open, and why were they dismissed? For example, if the driver of the public health risk is faecal contamination, why doesn't Parks Victoria simply install a UV disinfection unit to remove this risk. Such units are relatively inexpensive, operate automatically, and are now common in backyard pools, spas and town water supplies. I would argue that the cost of installing and maintaining such a unit over summer could be less than loss of recreational amenity for local residents and visitors from the pool closure. If Parks Victoria is concerned about the costs of this or other options, has Parks Victoria engaged with the public on its willingness to pay to maintain access to the pool over summer?

4. If the ban remains over summer and options to mitigate public health risks cannot be implemented, what monitoring will Parks Victoria put in place to provide early warning of any impending closure in subsequent summers? A cave stream fed from a limestone aquifer is likely to be a slowly receding stream that

provides early warning of low flow conditions. In other words, the water does not disappear suddenly overnight, but rather the flow will reduce slowly over weeks or months in the absence of rainfall. Given this local hydrology, Parks Victoria should be able to give advance warning to the public, so that people can change their travel plans, and that local businesses can brace for any reduction in tourist numbers as a result of the pool closure.

I look forward to receiving your responses to these questions, and hearing that Parks Victoria is working proactively with local council and the local community to come up with a solution that maintains access to this recreational asset of State significance.

Regards,

Brad Neal

Author of Swimming Hole Heaven including the *Guide to Freshwater Swimming Holes in Victoria*

<https://swimmingholeheaven.com>