

5 March 2002

Prof P Newman  
Director, Sustainability Policy Unit  
Department of the Premier and Cabinet  
15<sup>th</sup> Floor, 197 St Georges Terrace  
PERTH WA 6000

Dear Peter

#### CONSULTATION PAPER FOR THE STATE SUSTAINABILITY STRATEGY

The Chamber of Minerals and Energy is delighted to have the opportunity to provide its views on *Focus on the Future: Opportunities for Sustainability in Western Australia*. As you know from your direct discussions with our members and your presentation to our Executive Council, WA's minerals industry is an active participant in sustainable development at both a practical and policy level. We look forward to this involvement continuing.

In general, the paper does an enviable job of putting an often esoteric agenda into an appropriate State context. We support the staged approach being taken by the Government, in as much as it is attempting to educate the wider community about the concept of sustainability and its generic implications before locking down specific sustainability strategies.

There are, however, two aspects in this general context setting that give us concern.

The first is in relation to the 'sustainability principles' identified on page 5 of the paper. Despite the fact that sustainability is acknowledged to have three pillars (social, environmental and economic), the Government's sustainability principles deal only with the first two. The principles make no mention of the importance of economic growth and its capacity to deliver better environmental and living standards to all Western Australians. This is an important oversight.

The second is in relation to the definition of sustainability offered by the Premier in the preamble to the paper. In it, he states that economic, social and environmental goals can be achieved simultaneously, "without trade-offs or compromise." This is an extreme definition of sustainability and, while laudable and sometimes achievable, in most cases will not be realistic. A more robust and

pragmatic definition would involve careful identification of the impact (be it positive or negative) of a particular action on all three pillars of sustainability, and a conscious weighing up of these before decisions are taken. If the Government were to apply the definition offered to its own activities, then few of its action could be considered consistent with sustainability.

Our remaining comments address specific sections of the paper.

## The Role of the Sustainability Policy Unit

In our view, a key role of the Sustainability Policy Unit should be to provide guidance to Government agencies on how sustainability considerations can be integrated into their decision-making. This would complement the Unit's work on awareness raising and promoting best-practice. Such guidance would assist those agencies in their work with industry. Currently, there is a tendency for Government agencies to tell industry that its actions should be consistent with sustainability, without actually specifying what criteria must be satisfied to ensure that is the case. If Government is to insist that industry's actions be sustainable, then it is incumbent on Government also to define rigorously how this is to be judged and to hold itself to those same standards.

To this end, we are somewhat concerned to read the number of initiatives which the Government intends will contribute to the pursuit of sustainability. In the absence of defining rigorously how sustainability will be judged, and what the associated objectives for the State should be, it is perhaps premature to require initiatives like the Review of Major Project Approvals Processes and the State Greenhouse Strategy to contribute to sustainability. Without such definitive overarching guidance, such initiatives will be 'shooting in the dark' and will tend to adopt their own definitions of the sustainability target. These may, or may not, be consistent.

This issue also arises in the discussion of the role of the State Sustainability Strategy, where the paper states that the Government encourages submissions that identify how business and the State economy can facilitate the transition to a sustainable future. The key attributes of such a future are yet to be defined, so it is difficult to identify how industry can contribute to their attainment. For more examples of the importance of providing greater rigour in this area, please see the attached issues paper released recently by the Chamber.

Also, and as you know, the minerals and energy industry is already at the forefront of sustainability, with wide-ranging programs in place to contribute to better environmental and social outcomes. Surely the start point in moving forward on this agenda is not simply to ask what more we can do in future, but firstly to assess comprehensively what we are already doing. It will only be by assessing the status quo against the desired 'end state' that we can identify the gap and develop appropriate strategies to move forward. And individual companies are much more likely to contribute willingly to the process if their current efforts are acknowledged.

## Producers and Consumers

There is an assumption throughout the paper that producers have exclusive responsibility for achieving sustainability. In fact, much of the responsibility for driving necessary changes in approach will rest with consumers. If consumers vote

with their feet, and only purchase goods and services produced 'sustainably', then this will drive a change in industry's approach much more quickly than mere Government encouragement. On the other hand, if consumers fail to reward sustainable producers by acquiring their goods and services, there will be less motivation to change. For this reason, it will be essential for the State Sustainability Strategy to focus on empowering the wider community to make more sustainable choices.

## Rehabilitation in the Mining Industry

We note the box on page 3 which highlights an example of rehabilitation in the minerals industry. While we obviously welcome this acknowledgement, we note the emphasis on rehabilitation recreating native habitat. To be truly consistent with sustainability, the emphasis in rehabilitation would be on turning the land post-mining into the most productive economic, social and environmental asset for the community. As such, it should not be assumed implicitly that all land should be returned to its pre-mined state. It might be preferable, for example, to turn a piece of land into a carbon sequestering non-native forest, or into a park for public amenities, depending on the needs and desires of the local community.

## Partnerships for Sustainability

We were somewhat surprised to read that the State Government is forming a partnership with the Chamber of Minerals and Energy to assist in the development of its Sustainability Strategy. To date, no-one from Government has approached us formally on this issue. Nevertheless, we would welcome the opportunity to form a closer relationship on this issue. This is particularly important given the Government's emphasis on identifying the role that industry can play in moving toward greater sustainability. A formal partnership would allow us to explore this issue in detail, and to highlight the many hundreds of initiatives currently being undertaken by the industry.

If we can be of any further assistance with preparation of the paper then please contact Greg Johannes, my Director of Environment, Community and Government, on 9325 2955.

Yours sincerely

Tim Shanahan  
Chief Executive