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PUBLIC SUBMISSION ON THE STATE SUSTAINABILITY STRATEGY: *Focus on the future.*
Opportunities for sustainability in Western Australia, Government of Western Australia, 2001

Dear Members of the Sustainability Policy Unit

It is pleasing to see that a serious and high level attempt has been made to capture the notion of sustainability in a form that can be more readily interpreted, progressed and applied than past definitions and strategies have allowed.

However, there is an underlying feeling throughout the paper that economics is the key 'sustainability' principle, and that (at least in political terms) 'development' remains paramount: for example, paragraphs 5 and 6 under the heading "The Role of the State in sustainability strategy". Can we be sure that counter-balancing social and environmental needs will be well secured in policy and action? Maybe some re-wording is necessary to counteract this impression.

I note that the DPI's *Future Perth* paper (No. 10) on sustainability defines sustainability as the simultaneous achievement of economic, environmental and social goals. This is an uncomplicated definition. It also states that sustainability is a vision and process and not an end product (although I believe this is contradicted in the setting out of a number of actions later in the paper). My feeling is if you don't set down targets/outcomes then there is little chance of progressing or achieving your goals. Perhaps such distinctions need to be made clear.

The following three sections use the public comment format set out in your consultation paper. These are followed by some contextualised comments.

BOX 1 - Key Questions

Note: does your original Draft paper have page numbers on it? If not, it would help if they were numbered..

The following responses to your questions are in dot point order as set out in Box 1.

Dot pt. 1 Yes, provided that:

- goals and objectives are clearly and concisely set out i.e not just expressed as broad motherhood statements lacking in substance or applicability; and that the goals and objectives are entrenched in clear policies and actions;
- in the pursuit of goals and objectives, options and trade-offs are clearly identified;
- outcomes are targeted, achievable, measurable and accountable;
- short-medium-long term time frames are firmly established,
- research and innovation is actively supported, and
- partnerships are developed with mutual good-will and understanding, rigour and commitment.

Dot pt. 2 It could be expected that there would be a greater focus and firmer commitment by Agencies and communities towards the defined environmental/economic/ social objectives, as agreed to by the key players when developing ideas, policies, strategies, plans or programs.

Dot pt. 3 Current opportunities are unclear. If they exist (often implied or assumed), they have not been clearly enunciated, communicated, or specifically adopted. Some of the directions suggested in the paper are good but would benefit from further input and refinement - hopefully gained from the public comment and revision period.

Dot pt. 4 The role of the different players in facilitating change needs to be supported by a dedicated and progressive education/communication process within a well defined sustainability framework. Consultation between all parties needs to be active and open, with targeted commitments to follow-up, implement and review. A permanent Sustainable Policy Unit, if established, might include an education/communication group or strategy.

Dot pt. 5 Numerous examples exist in WA of ‘good practice’ underpinned by sustainability principles (some spelt out, others implied) but often people are not aware of them. For example: go to Dpt. Agriculture web sites; look at EPA (DWCP)’s COPs and SCCP/Riverplan; industry and mining COPs/EMSs, and Environment Australia (NEPMs?). Check Agency/industry/local government Annual Reports for ‘sustainability’ statements? Look at practices of some of the better consultancies in the State.

Dot pt. 6 R and D is already happening in WA. It appears that a thorough inventory (starting with educational institutions, Agencies etc) is required to address the depth and scope of R and D in order to avoid the risk of duplication and waste of resources. If this is not done, chances to be strategic in achieving co-ordinated and focussed State and community sustainability goals will be compromised. The list of projects supplied on your web page appear to ignore the fact that a number of topics have already been studied, reported on. It could be helpful to look at, for example: Dpt. Agriculture websites, the national Land and Water Audit; RIRDC projects/reports; Regional bodies strategies and programs; University theses/research programs/courses (the latter are to be brought in under your proposed Global Centre for Sustainability? But why ‘Global’??? What is wrong with a ‘State’ Centre, or just “Research Centre for..”

Dot pt. 7 Find better ways of implementing, promoting, reviewing relevant international, National, and State agreements/policies/protocols: public and non-target groups/Agencies are often unaware of these even though they might be directly/indirectly affected by them. A communications strategy needed (Dot point 4) : for example, your point on the cost savings of eco-efficiency is a powerful message for business and industry but how widely is this known?

Adopt/refine/promote key economic/social/environmental indicator data such as used by OECD; broaden national/State ABS data base to include key indicators; nationally harmonise reporting/bench marking across all sectors: some of this is already being done through SoE but needs further development, and not created ‘for the sake of’; have a good look at inter-State sustainability models across different sectors.

BOX 2 - Different perspectives

Need to ensure all sectors listed are *actively* engaged in consistent sustainable policy development, implementation and review processes. This includes adequate resourcing to carry out tasks, and appropriate processes, structures, actions (including reporting procedures?), MOUs to help secure desired outcomes.

BOX 3 - Examples of Sustainability issues

Sustainability, governance and society

- Consider whether sustainability is achievable through: informal adoption into government, industry and community groupings; specific policy frameworks, legislation, regulation ensuring uptake, or a combination of both - desirably the latter? Are there models elsewhere that provide guidance on this (for example, Canadian government).
- Ensure partnership agreements are fair but not weak, and that firm agreements are made to progress actions on key issues;
- Publicly acknowledge good corporate and community behaviour through recognition (rewards, incentives); Ensure that sound, consistent and regular reporting mechanisms are in place and appropriately supported;
- Seek five year reviews of policies, agreements (as a minimum?);
- Government purchasing power is one among a range of tools (including non-economic) and should not be seen as exclusive; depends on outcomes (which may be multiple) desired; complex systems demand complex (and flexible) management and solutions;
- Ensure openness in inter and intra-government behaviours, and in government relationships with the community and industry;
- Actively seek community inputs *early* rather than later in policy and planning development and decision-making processes and ensure these inputs are appropriately valued;

- Avoid over-loading communities/volunteers with information and obligations - backlash/burnout potential (refer to DPCs *Guidelines for use of volunteers in public sector agencies*, currently under revision);
- Acknowledge and endorse the notion of ‘mutual obligation’ (which has all but disappeared from policy documents): it is critical to all transactions, encapsulating values of good-will, trust, commitment, equity and democracy.
- Establish a permanent high level sustainable policy unit as a body to develop and deliver policies and information, and to act as the prime reference point for government, industry and community. Support the unit with expert Working Groups, as required;
- Secure amendments to relevant legislation, policies and regulations that endorse, adopt, and deliver on sustainable principles and actions;

Other points

- **Data/information** availability - improving but still a long way to go. Consider matters of harmonisation, access/sharing, standards, bench marking, appropriate models, cost of data/information, IP issues;
- Problems of **duplication** - how to avoid overlap, waste of resources etc - promote efficiency and better consultation, cross Agency/community contact, data/info sharing, networking; may require some government subsidisation, inter-Dpt. agreements
- **Agricultural management** practices - a co-ordinated and State-wide (and cross-Agency?) framework required based on catchments (or bioregions), with formal policy or legislation to support it. Manage at regional level. Investigate other State and New Zealand models. Revisit, broaden Draft Agricultural Management Act and State NRM Framework.
- **Heritage**, natural and cultural issues not adequately addressed? (One box/photo on Fremantle heritage). They can act as benchmarks, promote sense of community in support of key social values.

Other Strategies (Box 3)

- **Greenhouse** - still resistance in broader building trade to alternative energy practices/structures (particularly project homes, owner/builders); investigate how to further behavioural change in the broader sector; consider stronger planning policies, incentives, subsidies (including retro-fitting).
- **Industry** - many small and medium businesses fall through regulatory nets - use COPs, models of good practice, education etc to support change (see, for example, success of Swan River Trust’s industry survey).
- Consider a forum of all relevant types of **regional groups** in the State (managerial level, perhaps convened by UWA’s Institute for Regional Development) - Agencies, Cth, NGO’s etc - to harmonise sustainable policies, initiatives; develop strategies, secure commitments, offer regional incentives/awards/recognition; regional groupings could form part of the Policy Unit?
- More investment in **public education** to communicate objectives, policies etc as an aid to modifying behaviour (eg Watercorp water-conservation model(s)?)

Some points from the main text of consultation paper

(Italics indicate consultation paper headings)

1. What is sustainability? Para. 4 - there is a school of thought that says ‘**political**’ should be added to ‘triple bottom line’. Political settings are as much shapers/drivers as the other three criteria.

2. A Challenge and opportunity Para. 2 - not only a matter of addressing fundamental causes of problems but also recognising their **complexity** and **inter-relatedness**. Might also note the **cascade** effects of degradation.

Linked to this is the matter of **scale**, a fundamental issue. Each scale operated at requires solutions matched to them while acknowledging processes and impacts across each scale (global, national, regional, local, district, site etc). Similarly, generic solutions applied across different scales are likely to fail.

3. *Facilitating sustainability* - would you consider 'consultation/openness/participation' as important principles?

4. *Existing government initiatives*. Where is Local Agenda 21 (now renamed? - check with WALGA, former WAMA)? **Local government** receives very little attention in this paper and yet it is at this level that a good part of the State planning processes occur. Profile needs raising. Might add the *State Planning Strategy* as this sits over others you list.

5. *Partnerships for sustainability* - Note the Swan Catchment Council's *Swan Region: A natural resource management strategy* (Draft, 2001). Involve the Council in future consultations and partnerships. It is widely representative of community, industry and government with regard to the sustainable management of natural resources in the Swan Region.

6. *Role of State sustainability strategy*. A critical omission in dot points, para 2: **Resourcing** - how will these proposed changes be progressed/supported?

7. *Global and local sustainability issues* - Global context dot points: you need a dot point for **pollution** - consequences for natural and human systems, costs/risks to society/governments. Might also include a dot point on the impacts of **social disruption** as a result of war, natural disaster etc - mass migrations, conflict, aid etc

Incidentally, Dot pt. 2 - there is a growing concern among international scientists that wars/border/national/international frictions will escalate this century as a result of conflict over competing access to **water** (and over water quality). In a lesser sense, this scenario exists across State boundaries in Australia: it is a core 'sustainability' issue for this country, not to mention Western Australia.

Dot pt. 10 - Why have you singled out **salinity** in the last dot point? Other degradation factors (soil erosion, desertification, biodiversity loss), including Australia, sit well ahead of this - see, for example, UNEP *World Atlas of Degradation, Land and Water Audit*. Maybe use 'degradation', perhaps followed by 'for example...'. Salinity has captured the political agenda rather too successfully (which is not to diminish its importance).

8. *An Australian perspective* - the first sentence is a rather sweeping statement. Maybe couch in terms of 'In Australia, **people** enjoy a high standard of living'.

Para. 1 - to your list of key data, add something on **water**, noting high pressures on the natural resource as a consequence of extraction, pollution, salinity, hydrological modifications.

OECD key indicator data also indicate Australia is among one of the world's highest generators of **industrial and municipal waste**. Add some data.

Para. 3 - the **rich/poor gap** is a global problem.

9. *Focus on Western Australia* Para.4, line 10 - if you are expressing an average figure, why give a range?

Para.5, line 1 - for some more recent data, maybe refer to **Future Perth** (considering over three quarters of the State's population lives in the metro region) rather than the 1998 SoE report; or obtain interim data from the current SoE working group.

Para. 5, line 11 - patterns of production and consumption (and by implication, behaviours) are not the only 'drivers'; **policy and planning** decisions have direct and indirect impacts on priority environmental issues, as do socio-economic ones (alluded to in your following pghs, but could be more closely defined as pressures/causes).

Para. 10 - You need some sort of linking sentence at the end of para to tie in with the next, along the lines of...'some strategies to achieve these include:' and then re-word start of next para.

Para. 11 (and elsewhere). Could you please **reference** any document referred to in the text of your paper, and other sources consulted during its preparation. Although this is not always the convention with such documents, it is a useful addition for the benefit of public (and Agencies) and enriches the value of the consultation paper.

Other omissions: the WA Conservation Council's Sustainability conference, *The Way Ahead*, Feb, 2001 ought to be referred to as it was widely representative of community, Agencies and industry (some top-level) (available from

Conservation Council on CD). Note also the Swan Catchment Council's *The Swan Region: A Natural Resource Management Strategy* (referred to above).

Para. 11 - your reference to 'triple bottom line' does not seem to be explained elsewhere in the paper (spell out what it means - not everyone will know - use a Glossary?).

Para 13 - The *Dept. of Training* report should be referenced. Incidentally, is it 'society' or 'people/humans' who do the damage?!!! Their second dot point: again, would draw your attention to the enormous amount of environmental (and other) data being generated under the Land and Water Audit, and other national/State meta data initiatives. It is disappointing that government Agencies appear to be unaware of what others are doing (even within their own Agencies). Any ideas on how to deal with this problem?

Thank you for the opportunity to participate. I wish you well in your endeavours

Yours sincerely,

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