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7 May 2002

Professor Peter Newman
Director, Sustainable Policy Unit
Policy Office
Department of the Premier and Cabinet
15th Floor, 197 St Georges Terrace
PERTH WA 6000

Dear Professor Newman

RE: STATE SUSTAINABILITY STRATEGY

I understand that the period for comment on this paper closed at the end of April, however I hope that it may not be too late for some of my points to be considered during the preparation of the Draft Strategy.

It was with pleasure that I read the consultation paper "Focus on the Future: Opportunities for Sustainability in Western Australia" as it provides the beginning of a much needed strategy for ensuring that WA is meeting the needs of the community and environment within a sensible economic framework.

General Comments

- There is a lot of information in the paper about possible work to be completed in the future. Nowhere does the paper suggest that we should utilise existing "Best Practice" not only within Australia but internationally. There is no need to expend large amounts of Government money to employ consultants to regenerate information that is already in the public domain. What may be needed are specialist consultants from industry groups to facilitate discussions and the partnering process to develop the long-term solutions.
- The Strategy must be apolitical if it is going to meet the needs of the community. The draft strategy must resonate with all stakeholders irrespective of their persuasions so as to set the foundations for developing SD in this State. When reading "An Australian perspective" for example one may conclude it is discussing issues around the current WA Government's platform, with a focus on indigenous issues, suicide and the dichotomy between the wealthy / poor, and unemployment. One paragraph of this section deals with the environment (in a very general way) while the remaining paragraphs deal predominantly with social issues. The third plank of sustainability, that is economic sustainability, is not addressed in this section.
- The paper contains many excellent concepts and examples of initiatives, but it is difficult to follow. It appears that the need to include so many good ideas has led to a degree of disjointedness for the reader.
- Lay-out in the draft strategy could be improved by following this suggested format:
 - An opening statement (the current one is good but it is okay to say we are still grappling with the concept and hence the need for the development of the strategy).



- What is SD (The concept of SD was introduced in 1987 by Brundtland as chair of the World Bank, then adopted by the UNCED)
 - Why is SD important to WA
 - Where is WA currently and what is the vision for the future?
 - Then address each of the areas perhaps from specific local, State, Federal and internationally for:
 - Social responsibility
 - Economic Benefit
 - Environmental Stewardship
 - Governance (which is overlooked in this document until the last page in Box 3)
 - The plan ahead (developing the strategy)
 - Reference material and appendices.
- To ensure long term integration of the three planks of SD there is a requirement for the overriding fourth plank to be in place: Governance, which includes values and behaviors, management systems, policies, codes of conduct, ethical beliefs, reporting processes and integrated risk management, etc. While the report talks about policies and systems it does not put these items into context within the SD framework.
 - It is important that people realise that Environmental Impact Assessments (EIAs) are a useful tool in ensuring long term SD, but that EIA's now need to be expanded to include a study of the social impact of proposals and an economic benefit analysis. One of the most useful ways the Government can contribute to sustainability is through the development (in consultation with all stakeholders) of Sustainability Criteria for the assessment of proposals and developments submitted to any area of Government
 - All proposed legislation should be released for consultation with an accompanying assessment against Sustainability Criteria and the public should be able to comment on the validity of this assessment as well as on the proposed legislation itself.
 - The draft strategy should describe how sustainability will be implemented and provide for the development of a conflict resolution process
 - Would the WA Government be prepared to be assessed against the Dow Jones Sustainability Index?
 - Partnering is a current focus of SD with tripartite liaisons between the government, business, community and NGOs. Perhaps more can be made of this by focusing the report on the specific planks of SD as addressed above.

Specific Comments

- The three case studies on page 2 provide examples of initiatives developed by partnerships with the community to address specific issues. Each box should highlight the main principle that is being illustrated – Lake Toolibin (Social), Fremantle heritage (Economic) and Cottesloe Reef (Environment).
- The credibility of the Strategy will depend on buy-in from the community. The use of the Cottesloe Reef as an example of environmental stewardship when the proposed Ningaloo Reef development is so contentious may not be politically astute at this time. Perhaps an example of the prevention of die- back or reducing greenhouse emissions might be more appropriate.
- The Premiers opening statement misses “Governance” as an integral concept in which the WA Government will play a major role. Perhaps this element should be mentioned in the introduction to the draft Strategy.



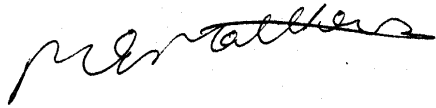
- The Mine Site Rehabilitation case study should make note of the “Global Mining Initiative”: a two year independent Mining, Minerals and Sustainability Study funded through the WBCSD was released in April 2002 and established the International Council on Mining and Metals to develop and articulate their case for SD. This will impact on the State due to the current large economic base mining provides.
- The statement that “human productivity has increased by 20000 percent..” should really be referenced to provide credibility or perhaps reworded or left out.
- The boxed case studies provided through out the report might have a small Venn Diagram associated with them highlighting proportional circles for economic, social, environmental and perhaps governance to show how the example fits within the framework. For example renewable energy might have a large environment circle, with a medium-sized social circle and small economic circle. While “Gas as the....” might have a large economic circle, medium-sized social circle and small social circle. For some case studies all the circles may be the same size as the planks are equally weighted.
- Who checks how products are used, such as LNG in China. What is the governance process for product stewardship?
- The section on existing Government initiatives doesn’t really indicate where they fit within the SD context. Perhaps highlight the relationship to the planks but talk about the initiatives by grouping them under the four areas.
- Partnerships could be highlighted at an earlier stage of the report.
- Do the three Case Studies on livable neighborhoods, transport, and Coolamon have a common theme such as Urban Living? It would be worthwhile grouping them under such a heading and pointing out how these developments benefit future generations?
- The sentence “Given the significant and fundamental changes that will need to occur...” makes sustainability sound too hard to achieve. Many people and organisations are already working towards achieving SD so we should not make it sound more difficult than what it is. “Currently, there are limited opportunities....”. The Strategy should contain more positive statements that make the public feel empowered to achieve!
- The section headed “The global context”
 - “connected to other States and countries”
 - “ Some of the global issues that require a shift” would read better as “ some of the global issues that require sustainable solutions include...”
 - the number of people who live on US\$1-2 a day is projected to increase from 2 to 4 billion – put this figure in context as % of world population
 - Care should be exercised with statements such as “Global oil production is nearing its peak” as this has been said for nearly 20 years without once being true!
 - Does this Government accept that “noticeable and sustained climate change is now occurring”? This is a strong statement compared to the ones generally published in Government policies.
- “A focus on Western Australia” talks about a productive agriculture sector. Perhaps “efficient and productive” may be more desirable in the context of the SD philosophy since it is generally agreed that agriculture has had the single greatest impact on the State’s environment. Long term we need efficiency and plans for rehabilitation of the land.



- The section listing examples from the Government's "Innovate WA" Strategy does not explain how innovation relates to sustainability.

I hope you will find some of my comments useful and I look forward to the release of the draft Strategy.

Yours sincerely

A handwritten signature in black ink, appearing to read "m. matthews".

Margaret Matthews
Director Responsible Care & WA State Representative

