

Submission to

Sustainability Policy Unit,
Department of Premier & Cabinet

The draft State Sustainability Strategy

William Grace

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1 INTRODUCTION

This submission does not seek to comprehensively address all aspects of the draft Strategy. Rather it addresses specific issues that I believe require consideration in the development of the final Strategy.

Section 2 provides an overview of the Strategy and makes general points about the thrust of the proposals and their implementation.

Sections 3 to 7 involve comments on selected sections of the draft Strategy.

2 OVERVIEW OF DRAFT STRATEGY

2.1 Creating a common understanding of sustainability

Most of the world is struggling with a definition of Sustainability that is meaningful. The draft Strategy has adopted the following:

Meeting the needs of current and future generations through simultaneous environmental, social and economic improvement.

While recognising the difficulty inherent in any definition, and the improvement of this over the initially proposed definition, I believe that the above remains problematical, for the following reasons:

- It reinforces the view that the 3 constituent components are separate when they are actually interdependent subsets (economy as a subset of society, and both as a subset of nature)
- it doesn't provide guidance on how to act to meet the stated aim (*meeting the needs...*), nor how to recognise progress.

A similar definition, but one that addresses the latter point in particular is:

Optimisation of the resources at the disposal of human societies in order to sustain and enhance quality of life over the long term.

This clarifies more explicitly that what we are trying to “sustain” is our society, and “optimisation” provides guidance on how to progress, and can be applied to all forms of human endeavour, eg:

- A government managing a State
- A company seeking approval to mine non-renewable resources
- A household managing its resource inputs and waste outputs

This definition is in fact more closely aligned with Newman and Kenworthy's extended metabolism model than the proposed definition, and as such recognises the dynamic nature of societies, and the transitions necessary to get from where we are to where we want to go (more liveability and less waste).

Such a definition still leaves plenty of room for interpretation (and therefore opportunities for policy development) about what is necessary to progress its agenda. For example, while some might propose a narrow materialistic definition of quality of life, others (including me) would argue it is much a broader concept and encompasses many attributes, eg:

- Prosperity
- Health and life expectancy
- Educational attainment
- Safety & security
- Artistic and cultural fulfillment
- Social participation
- Environmental amenity

Areas of social justice, equality of opportunity and respect for cultural and religious difference reflect the import of these as factors that promote social cohesion, and hence, indirectly impact the quality of life for us all.

The resources available to us as a society are:

Natural:	renewable resources (eg timber, arable land, fish and water) & non-renewable resources (eg fossil fuels)
Human:	The health, knowledge, skills and motivation of the society
Social:	families, communities, businesses, trade unions, schools, and voluntary organizations
Manufactured:	material goods - tools, machines, buildings, and other forms of infrastructure
Financial:	enabling other forms of capital to be owned and traded

All human activity involves the exploitation of one or more of the above resources. The key to adopting more sustainable practices revolves around combining these in the service of society as a whole, while enhancing rather than degrading the resource base.

The above is offered as an input into the debate. While considerable work has gone into the Framework via the development of Principles, Visions and Goals, the Strategy needs a clearly communicable definition of what Sustainability is all about, and one that provides: guidance on how to progress towards it.

2.2 The Major Gap in the Draft Strategy

To me the glaring omission in the draft Strategy is (ironically) that issue which governs the ultimate sustainability of our communities in Western Australia – the economy. While the draft Strategy describes the importance of industries in the natural resources sectors, there is no overall analysis presented of the foundations of the Western Australian economy and:

- Whether the present dominant economic activity is itself sustainable
- Whether present Industry policy is compatible with sustainable economic growth
- How susceptible our quality of life is to eventual changes in the economic mix resulting (for example) from resource depletion and degradation of arable land
- How we are to guide our economy towards sustainable economic growth in the best interests of the community.

In the absence of any analysis of the “big picture”, the Strategy tends to focus on how we might improve the social and environmental performance of existing economic activity, rather than propose a blueprint for the long term economic management of the State.

The most obvious sector for analysis is minerals and energy, which according to the draft Strategy accounts for 25% of Gross State Product and 17% of employment. By definition these industries are based on non-renewable resources, and in the long term these resources will disappear. As a community we will need to replace the present economic (and associated social) benefit we derive from these industries with something else. What will it be? When do we need to start making the transition? Are we (as a community) deriving the optimum benefit from these finite resources?

How this and subsequent governments manage the State’s resources through its Industry policy will ultimately have the largest impact on the sustainability of our communities. Buried on page 202 of the document is the stated objective *“Ensure that economic policy in WA is consistent with the principles of sustainability.”* It is imperative that the economy receives a higher priority in the final document and that the government’s pivotal role in managing the State’s economy is recognised in the Sustainability Strategy.

The final strategy should include:

- an overall analysis of the WA economy
- an identification of the long term threats to our economic base from resource depletion, environmental degradation (including climate change), and market trends
- a strategy to make the above permanent features of Government reporting and to link them to the State's economic management including through industry policy.

2.3 Implementation

2.3.1 Wording

Inherent in the wording of some of the actions is hesitation about support, and / or the priority of the proposal. For example "Move towards..." or "Work towards..." or "Promote..." are used in relation to a number of important recommendations, eg

- Sustainability assessment of state significant projects
- Adoption of Liveable Neighbourhoods
- Home energy ratings

While there may be legitimate concerns from some stakeholders over proposed Actions, this terminology suggests further debate rather than a specific Action, and could result in responsible parties doing little or nothing. If further work needs to be done to define the eventual action, this is what the recommendation should say. For example (4.13):

"Involve all relevant stakeholders in finalising the current review of Liveable Neighbourhoods, with a view requiring all government and significant residential development to adopt the framework."

This confirms the end result, and it is much easier to develop an Implementation Plan for a "review" than a "move towards".

2.3.2 Categorisation

The draft Strategy says the Government will develop a detailed Implementation Plan for the final Strategy. This Plan must include:

- What is to be delivered, including:
 - The proposed Action
 - How it relates to the objectives and goals of the Strategy
 - How monitoring and evaluation will occur
- Who will deliver, including:
 - Roles and responsibilities of key players
 - Resource and capacity issues
- Timelines, including:
 - Time required to gear up
 - Time to implement
- Budget, including:
 - Capital and establishment costs
 - Ongoing operational costs

The present draft contains a variety of "types" of Proposed Actions. Some are extensive in their implications (eg the establishment of a major science-education facility), and others are merely policy modifications (eg expansion of existing sustainable tourism accreditation). The ramifications for the development of an Implementation Plan therefore vary significantly from action to action.

In order to facilitate the development of a coherent Strategy, and a companion Implementation Plan it would be useful to categorise all the proposed Actions. The following is a suggested for consideration:

- Establishment (Global Centre for Sustainability etc)
- Legislation / regulation / etc (Biodiversity Conservation Act etc)
- Strategies / plans / policies / procedures etc (Regional Sustainability Strategies, Bioprospecting policy etc)
- Studies / investigation (Population / Consumption study, parking demand etc)
- Training / capacity development / awareness

2.3.3 Responsibilities

Determining the various institutional responsibilities for the implementation will be a critical component in the success or otherwise of the Strategy. The government faces a huge challenge to create interfaces across the various agencies to facilitate a whole of government approach to Sustainability.

Both the planning and the implementation of nearly all of the recommendations will require consultation between different groups. It is suggested that responsibilities for each Action are clearly defined, eg:

Primary Role	The Agency that takes the lead role in implementation, and identifies other parties to be consulted.
Consultative Role	Others take the lead role, but the Agency is consulted and contributes to implementation and review of progress
Review Role	The Agency contributes to implementation and the review of progress
Informed	The outcome is relevant to the Agency and it is informed of implementation plans and progress.

This proposal is suggested as a way of managing the stakeholder interfaces generally across the Strategy. This would create a network across State / Local government, WA collaboration, business etc that would facilitate both a clear understanding of who is working on what, and a holistic approach to the tasks.

3 SUSTAINABILITY AND GOVERNANCE

3.1 Sustainability Assessment

As a member of the Keating Committee, I was involved in the recommendations related to Sustainability Assessment. I believe that the adoption of processes such as this will ultimately yield the greatest benefits from the Strategy in the longer term.

However, there are some significant issues to resolve before a coherent process can be introduced.

- Criteria for social and economic assessment
- Integrating the assessments

3.1.1 Criteria

The ground-rules for environmental protection are clear to both proponents and the public after some 15 years of experience with the EP Act. Based upon its enabling legislation, the EPA's overall goal has two parts:

- to ensure the environment is managed so that it is conserved or enhanced.
- to ensure that development in Western Australia is environmentally acceptable.

The first of these is essentially a criterion to be applied (inter alia) to development proposals. To be acceptable, projects must conserve or enhance the environment. However the

addition of social and economic dimensions to any evaluation scheme begs the question of what criteria are to be applied to decision-making in respect of these impacts.

A review of the current assessment of the Gorgon project illustrates the difficulty. The Standing Interagency Committee of Chief Executive Officers (SIAC) is charged with an assessment of Chevron Texaco's proposals to use Barrow Island for processing gas from the Gorgon field. What are the State's economic and social objectives in relation to this (or any) project? Assuming neutral environmental and social impacts, is any net economic benefit acceptable, or should the State be seeking to optimise the economic benefit? What are the social objectives of the project, indeed of resource projects generally?

The reality is that in the past, the State has been essentially "reactive" to development proposals, rather than attracting development based on any specific industry development strategy. We run the risk that moving towards the assessment of proposals on a holistic economic, social and environmental basis, in the absence of clear objectives, will lead to arbitrary decisions and an undermining of the credibility of the process. As noted elsewhere in this submission, any Sustainability Strategy must incorporate a clear Industry policy, which itself is based on sustainability principles.

3.1.2 Integration

Although there are many techniques under consideration, there are no clear precedents for integrating economic, social and environmental impacts into a holistic assessment. Government has recently used Multi-Criteria Analysis (MCA) to support decision-making in respect of the Roe Highway extension and Perth-Mandurah transport corridor, and these may be useful examples to study. Whatever process is eventually undertaken the outcome will be affected by the following:

- uncertainty over the impacts and how this can be incorporated
- the significance of the impacts identified
- the weighting (priority) to be applied to each of the social, economic and environmental outcomes

3.1.3 Scope

The draft Strategy refers to the use of Sustainability Assessment for projects, plans, policies or programmes (PPPP). While this is supported, we should not forget that our greatest challenge relates to the legacy we inherit. Evaluating new PPPPs will result in important incremental improvement in outcomes. However we also need to be challenging existing PPPPs via Sustainability Assessment. Even if carried out at a high level and in a qualitative fashion, Sustainability Assessment should inform the development of the proposed Action Plans to be developed by Agencies in response to the Sustainability Code of Practice. Revisiting and updating the Assessments should form part of the audit and continuous improvement process that becomes embedded in the Action Plans.

3.2 Institutional Change

I support the intention of introducing Agency-by-Agency responsibilities for Sustainability. One single super-department cannot possibly deliver the required outcomes, or a consistent whole of government approach. Sustainability must be "mainstreamed" if we are to see public sector decision-making reflect the Sustainability principles proposed.

However what remains a challenge even with this model is the interface between Agencies. In 2.3.3 above I describe a possible approach to creating interfaces across agencies by clearly defining the role of each stakeholder in progressing each individual recommendation. This process, if adopted, would identify the critical interfaces between agencies and assist in devising new institutional arrangements and responsibilities.

The WA Local Government's initial submission to the Strategy (which I coordinated) recommended that the government investigate the potential of utilising the WA Planning Commission (expanded to include the State Development portfolio) and its committees as vehicles for delivery of the State Sustainability Strategy. The logic behind this recommendation is that most sustainability related issues ultimately involve land use, and WAPC has state-wide responsibilities for urban, rural and regional land use planning and land development. The Commission consists of members representing:

- local government (urban and regional)
- the community and professions,
- the minister for Regional Development,
- the infrastructure agencies (Planning & Infrastructure, Transport, Main Roads, Environment, Water and Catchment Protection)

With the exception of representation for the Minister of State Development, the WAPC has the coverage necessary to holistically oversee the introduction of sustainability into the State's administrative agenda. Of all the existing bodies in the State Government, the WAPC remains the most logical conduit for implementation of much of the State Sustainability Strategy. The major instrument proposed for introducing many of the initiatives are Statements of Planning Policy, which are of course under the control of the WAPC.

If the WAPC is not given such a role, it is difficult to see how many of the proposed sustainability objectives can possibly be met.

3.3 Partnerships

3.3.1 State – Local Roundtable

As coordinator of the WALGA submission that recommended the formation of the State – Local Government roundtable, I am very encouraged to see that recommendation taken up. Without recognition of the joint role of State and Local Government in many of the key public processes, a state-wide strategy would be virtually impossible to implement.

The key to success of the Roundtable will be ensuring that both the state government, and local governments, see it as the focal point of the sustainability agenda. This will depend on:

- The resources available to the Roundtable to properly research issues and develop comprehensive Action Plans
- The commitment of the State Government to drive the agenda of the Roundtable through the various state agencies.

3.3.2 Sustainability in the Regions

One of the prime issues on the agenda of the State – Local Government Roundtable is that of Regional Sustainability Strategies. My own view is that this offers **the single most significant opportunity in the Strategy as a whole**. There are a number of reasons why I feel this is so important:

- *Sustainability means most when it is applied at a regional scale.* This sub-heading captures the essence of the opportunity. People have direct connection with, and understanding of the key issues in their region: jobs, environmental degradation, social problems and the connection between them all. The key to the success of the Strategy will be mobilising ordinary people and their local representatives, and regional strategies can deliver this promise.
- The existing regional councils (particularly Eastern Metropolitan Regional Council) provide a starting point for the development of the organisations that can develop and implement regional strategies.

- There are many existing organisations such as catchment councils and environmental protection groups that could find a home as affiliates of regional councils in the delivery of the component parts of the regional sustainability strategies.

With these positives as a starting point, and with careful planning and consultation, the implementation of this recommendation should be both achievable and successful. To achieve optimum benefit however the Regional Councils should incorporate the Regional Development Commissions. This will give them the necessary economic focus, ensure a proper integration with social and environmental considerations and avoid the cost of duplicate establishment.

4 SUSTAINABLE USE OF NATURAL RESOURCES

4.1 Industry Policy

As explained in Section 2.2 above I feel the draft Strategy insufficiently deals with the “big picture” economic agenda for the State. While I have no problem with the proposed actions under the various headings in this section, what is missing is an umbrella of Industry policy that would inform the agenda for each of these sectors. Such a policy needs to be developed for the State and then interpreted into regional policies through the regional strategies.

Without this overall industry policy, we will continue to be reactive to development proposals and the environmental and social impact assessments will continue to be seen as anti-development by prospective project developers. Both prospective developers and regional communities (through their regional councils) should be aware and supportive of policies that have been developed for the long term economic, environmental and social benefit of the region.

This point again reinforces the need to:

- have a meaningful partnership with industry and potential employers.
- Include the role of Development Commissions in Regional Councils

4.2 Sustainable Agriculture

As the grandson of one of the pioneers of the north-east wheatbelt, I am familiar with the economic, environmental and social realities in the bush. This section of the draft Strategy makes for very depressing reading. While the development of Regional Councils will provide coordination of action, simultaneously:

- Remediating degraded land, and
- Changing to more sustainable agricultural practices

is a huge task. As noted in the draft Strategy *“serious doubts exist as to whether agricultural industries can finance the adoption of remedial and truly conservation-oriented farming systems.”* Given the importance of sustainable agriculture to our future, addressing this problem is possibly the most important single challenge we face as a nation. The proposed actions, while important, will not in themselves fix this problem. We need to face the fact that highly innovative, long term and expensive strategies will need to put in place if we are to succeed.

The development of such strategies, which must also involve the Federal Government, should be a key recommendation of the final Strategy.

5 SUSTAINABILITY AND SETTLEMENTS

5.1 Urban Growth

Despite the suggestion in the draft Strategy that the Metropolitan Development Programme is coordinating land supply, the reality is that Perth's urban development is still rather more influenced by developers with greenfield land holdings, than any coherent public policy.

Recent developments heralded by the government as Greensmart suburbs are in reality minimalist with respect to sustainability improvements, and are (laudable) initiatives of the industry rather than the government.

To the casual observer Future Perth appears to be moribund (the website has a heading entitled "Update – May 2000"). Recommendation 4.3 seems to be very weak on defining a process to settle on a strategic plan for the metropolitan area. It calls only on "... a *community debate* ..." rather than an outcome focussed strategy development.

The final Strategy should require the WAPC to revitalise Future Perth with a view to the development of a Strategic Plan for Perth based on sustainability principles within a defined timetable.

5.2 Integrating Land Use and Balanced Transport

The draft Strategy states that Liveable Neighbourhoods is "*increasingly becoming the norm .. in joint venture state government projects.*" However a closer look would reveal that only certain components of Liveable Neighbourhoods has been adopted in the cited projects.

The recommendation of the final Strategy needs to significantly strengthen the recommendation relating to Liveable Neighbourhoods. The (endless) review needs to be completed and the revised document mandated for all residential development projects.

5.3 Waste

The description of the activities and progress of the Waste Management Board and the Waste 2020 strategy in the draft Strategy infer significantly more achievement than has actually occurred. A year after its establishment the Board's achievements are minimal, and the promised review of the Levy, promised for September last year has only recently been commissioned.

In the meantime landfill continues virtually unabated and unaffected by the existing \$1/tonne levy. Virtually no-one in the waste sector believes that the objective of eliminating landfill by 2020 will occur with the present level of commitment. In the meantime the day to day problem of municipal waste management remains with local government, and it is they rather than State government who are responsible for the resource recovery initiatives underway presently.

It is questionable whether the WMB as currently constituted will deliver the outcomes described in the draft Strategy. The final strategy should report on the actual progress of the WMB in meeting its objectives and confirm the timing and content of the Waste Management Bill.

5.4 Building

As the ESD consultant for the South Atwell Primary School project, and the designer of environmentally designed homes, I am aware (and share some) of the concerns of the housing industry in relation to energy ratings for homes. However there is no over-riding impediment to the introduction of a home energy rating system. The final Strategy should require the introduction of such a system for both new homes and renovations – suggested wording:

Following consultation with industry stakeholders, develop and phase in a mandatory home energy rating system for all new homes, and for significant renovations of existing homes.

The draft Strategy also calls for the development of a Sustainable Planning, Building and Construction Guide but doesn't clarify:

- how the planning component of this will relate to Liveable Neighbourhoods.
- the scope of the document with respect to energy, water, materials etc

This needs attention in the final Strategy.

This section should also recognise:

- the development of the Australian Building Environmental Rating Scheme (NABERS) being developed by Environment Australia, and
- the Australian Greenhouse Ratings Scheme now implemented by the Australian Greenhouse Office and SEDO locally.

I would be happy to provide some text on these initiatives if required.

6 SUSTAINABILITY AND COMMUNITY

Although this comment is not particularly important in the context of the draft Strategy I have some concerns over Figure 10 and its associated text in this section. Peter Newman has also used this in several of the seminars. The graphic depicts the inter-relationship between civil society, the market and the Government with the following descriptions:

Civil Society: Values and Visions (long term)

Market: Consumer Products and Services

Government: Regulations and Infrastructure

This description and the following text completely dis-regards the role of government as the elected representative **of the community**, and infers that the government merely responds to ideas generated by special interest groups with rules and roads. While this may be the view of cynics about the current state of politics, surely the Sustainability Strategy is all about the government adopting a leadership position to drive sustainability in the interests of the community as a whole, not just special interest groups. I believe sustainability policy is a positive force for greater democracy, ie that it improves the representative nature of government. To describe the relationship between the government and civil society as a "partnership" seems to abandon the concept of government as a representative of the society. The document is filled with proposals for action by government that go beyond "regulations and infrastructure".

The chosen definition of sustainability, and the 164 pages preceding this one, make it clear that the Strategy is **about the community** (*current and future generations*) and so it seems incongruent to suggest here that "*community is so important to sustainability*".

While it is understood that this text is really just an introduction to the community actions, I feel the present draft offers a somewhat cynical and fatalistic view of the relationship between government and society. I would prefer to see the introduction focus on the fact that the Strategy is about the community and that improved social capital is one of the prime dividends from it.

7 BUSINESS

The relationship of business with the Strategy needs to be clarified in the final Strategy. In the Partnership section in Governance there is no mention of business (save for a reference to industry stakeholders in Rec 1.10). Under the Business section it says "*.. a partnership will be established with business*" but there is no mention of this in the proposed actions, and no suggestion of who the partnership will be with.

The creation of a partnership with WA industry will be critical to the development of a sustainable economy in the state.

The Chamber of Commerce and Industry (CCI); as the peak body for business in WA, is one logical partner in the process. Equally, if not more important, would be the Chamber of Minerals and Energy, remembering that the mining industry has sustainability firmly in its emerging agenda following the Mining, Minerals and Sustainable Development (MMSD) process recently completed.

As presently structured, the WA Sustainable Industries Group cannot really be described as an Industry body. However it is looking to restructure, and this may offer the opportunity for it to become a player in this partnership.

Any State Strategy that progresses without an interface with industry will be open to question.

Bill Grace

28-Feb-03

The author is an engineer and sustainability consultant working in the private sector, and has been involved in a number of initiatives relevant to the Strategy, including:

- *Membership of the Keating committee*
- *Coordination and management of the WA Local Government's first round submission to the Strategy*
- *Coordination of the Institution of Engineers, Australia submission*
- *ESD consultant to the Education Department's first sustainable school project at South Atwell*
- *ESD advice in relation to Department of Defence facilities in WA*
- *Project Manager of the Water Corporation's feasibility study for the proposed Subiaco Sustainability Park*