

## **Focus on the Future**

# **The Western Australian State Sustainability Strategy**

## **Consultation Paper**

### **Comments by the Conservation Council of WA**

#### **Introduction**

The Conservation Council welcomes the release of the draft Sustainability Strategy ('the draft strategy'), believing that it is a significant step in the journey towards sustainability in Western Australia.

While the draft strategy contains many worthwhile initiatives we are concerned that the recommended actions are largely ad hoc with some being too specific and others too general. Visions, objectives and outcomes are in many cases confused.

We are concerned that essential elements needed to deliver sustainability are either not addressed or are inadequately addressed, such as institutional arrangements and sustainability indicators, for example.

The Environmental Alliance has made several substantial submissions to the sustainability process over the past 2 years, including a detailed submission to the 'Focus on the Future' discussion document. We are concerned that many of the points made in these submissions have been ignored in the process to date. We recommend that these documents be reviewed again.

In this submission we reiterate some of the key points we believe are essential if we are to achieve sustainability in WA. We are particular concerned to ensure that governance and institutional arrangements are in place. We also make some specific comment on the detail of the draft strategy.

The Council is part of the WA Collaboration and has actively participated in the development of the Community Sustainability Agenda – we endorse that agenda and seek here to make additional comments on the draft strategy.

#### **General Comments**

##### **1. Genuine sustainability?**

Genuine sustainability is about meeting environmental, social and economic goals, but the draft strategy does not adequately incorporate the social and economic justice dimensions of sustainability. The form of sustainability in the draft strategy is primarily the interaction between environment and economic issues. The draft strategy is particularly deficient with respect to social issues – these will need significant attention in the final strategy.

##### **2. A participatory process**

The draft strategy identifies as a principle of sustainability that: "public engagement lies at the heart of all sustainability principles". Yet, the draft strategy and the process of finalisation was *not* underpinned by the broad-based, participatory process.

Genuinely engaging with the public is not a PR or marketing exercise or about influencing people – it is a two way process of communication and engagement.

A truly participatory process would:

- build ownership of the concept and practices of sustainability;
- recognise that there are numerous ‘communities’ and ‘publics’ in Western Australia and build different engagement strategies for each of these ‘publics’, for example:
  - the WA communities for whom sustainability is a strange and unknown idea; and
  - the WA communities already largely informed about, and committed to, sustainability

### **3. The need to comment on, and critique, public submissions**

As far as consultative processes are concerned, inviting written submissions (as in the process of developing “Focus on the Future”) is the bare minimum required. At very least, the public submissions should be responded to, either in the document or in a separate document.

The Environmental Alliance committed a considerable amount of energy and time into producing a submission to the original consultation document. We are disappointed that very little of this material was commented on in the draft strategy, apart from occasional quotes in the document. With respect to sustainability assessment, the Alliance produced detailed recommendations relating to institutional reform. None of these recommendations were directly commented on in the draft strategy.

#### ***Recommendation***

***The Council recommends that part of the final strategy be structured so that it comments on, and directly critiques, significant aspects of public submissions.***

### **4. The need for legislative backing**

Recommendations associated with Sustainability and Governance fail to adequately address the need for institutional reform to achieve sustainability. There are inadequate suggestions for legislative reform and responsibility for implementing recommendations is not assigned to Government agencies. The Council believes that these two elements are essential if the final strategy is to have real effect.

As stated in our previous submission, in order to truly make sustainability happen a priority should be a comprehensive legislative review (‘National Competition Policy style’) of State legislation to incorporate sustainability in a consistent manner. Incorporating sustainability principles in legislation as it is reviewed is not good enough.

Page 40 of the strategy:

“The government will consider existing legislation when it is reviewed to identify where there are opportunities to incorporate sustainability principles and practices and include guidelines in the Parliamentary Counsel’s Guidelines and Procedures for the drafting of legislation to ensure that sustainability is addressed in future legislation.”

This timeframe is unacceptable – at the very least key sustainability-related legislation must be amended as soon as possible or a key aspect of the agenda may not happen.

## ***Recommendation***

***The Council recommends the drafting of a Sustainability Act, to enshrine much of what is contained in the draft strategy, and to establish a Sustainability Commission to oversee the sustainability assessment system. The final strategy must include an outline for this proposed new legislation.***

### **5. Agencies need to be assigned responsibility for recommendations and timelines need to be set**

In line with the concerns mentioned above, the Council suggests that each recommendation in the final strategy should have a 'statement of responsibility' and a 'timeline' attached to it. For example, excellent recommendations are made in relation to a proposed Sustainability Code of Practice, and Sustainability Action Plans in Proposed Actions 1.5, 1.6, and 1.7. The Council suggests the inclusion of a new Proposed Action 1.8, as follows:

## ***Recommendation***

***The Department of Premier and Cabinet will require every Government agency to present its first Sustainability Action Plan at the end of the 2003/2004 fiscal year. The presence and quality of these annual Plans will be audited by the Auditor-General.***

***The Council believes that this level of commitment is required for every recommendation made in the final strategy.***

### **6. Sustainability indicators**

We are extremely concerned that the draft strategy does not address the issue of sustainability indicators. The Government's pre-election policy called for the development of 'alternative measures of economic growth/performance'. A promise was made to allow for community input into the determination of 'quality of life' indicators. The draft strategy makes no mention of this pre-election policy. We are bitterly disappointed that no action has been taken to start developing these indicators nor to comprehensively consider them in the draft strategy. It is essential that this be addressed in the final strategy.

## ***Recommendation***

***The Council recommends that a detailed proposal is included in the final strategy that incorporates sustainability indicators.***

### **7. Population and over-consumption**

The draft does not adequately address the issue of population growth in Western Australia. This is an issue that must be addressed in a Sustainability Strategy.

Neither is the issue of over consumption adequately addressed – in fact the draft implies there is little that we in Western Australia can do about the issue. This is clearly not the case.

Active campaigns are required to reduce consumption in Western Australia. The Environmental Alliance submission to 'Focus on the Future' made a number of initiative suggestions about how this could be done.

## **Institutional change**

While this section is titled 'Institutional Change' there is, in fact, no institutional change in the proposed actions. The actions only require an expansion of the role of the Sustainability Policy Unit.

This is a fundamental component of the whole strategy that essentially has been glossed over. It is our firm belief that without significant institutional change sustainability will not progress in Western Australia.

A unit within the Department of Premier and Cabinet is simply not adequate to handle the level of integration required to deliver sustainability. Our position has always been that a new Sustainability Commission should be formed. Without a sufficiently well-resourced Commission, there is a risk that the agenda will be marginalised and seen as irrelevant.

The Council has also developed models for institutional arrangements for biodiversity and marine protection. We proposed that a Biodiversity Commission be established that incorporates the functions and responsibilities of the Conservation Commission, the Marine Parks and Reserves Authority and has responsibility for the proposed Biodiversity Conservation Act. We propose that the Biodiversity Commission along with the EPA and the economic and social assessment units then provide advice to the Sustainability Commission. We attach for your information our submissions on these issues.

### ***Recommendation***

***The Council believes that the most effective way to progress sustainability in WA is to give ultimate responsibility for coordinating and driving sustainability to a single agency, a Sustainability Commission. The functions of a Sustainability Commission would include responsibility for:***

- ***the provision of an overview of sustainability performance, similar to that performed by the ACCC;***
- ***the provision of information on integrated assessment of proposals to Cabinet; and***
- ***auditing and reporting on performance of Government departments and agencies against sustainability indicators, targets and milestones.***

### ***Recommendation***

***We realise it will take sometime to establish the Sustainability Commission, we therefore recommend that SSS further develop a model to be used as a transition approach, which includes the following:***

- ***adequate funding for the Sustainability Policy Unit and the other Policy Units in Premier & Cabinet supporting the Cabinet Standing Committees be provided;***
- ***all Government departments will need to assign adequate resources (e.g. 1 key staff member) to "incorporate sustainability capacity into their policy functions" (Proposed Action 1.4); and***
- ***Mechanisms be developed for these assigned staff from departments and the Sustainability Policy Unit to communicate effectively, report on progress and have blockages dealt with at a high level.***

## **Embracing sustainability in government agencies**

There are some good initiatives in here such as the Sustainability Code of Practice.

There is a need to make department heads responsible for the implementation of sustainability programs within their agencies or they will not be a priority. Sustainability needs to be written into performance agreements and implementation targets need to be set.

## **Sustainability assessment**

### **1. The need for a sustainability assessment process for small projects, and for policies, plans, and programmes (PPPs)**

There is significant emphasis put in this section of the draft strategy on sustainability assessment of major projects. While working towards a triple bottom line assessment process for large projects is undoubtedly crucial, the draft strategy seems to discount the importance of impacts resulting from small projects, and from other types of proposal (policies, plans, and programmes). For example, on page 36 of the draft strategy, the following statement is made:

“... the review (*Keating Review*) noted that most submissions in response to its interim report were supportive of establishing such a framework (*ie for sustainability assessment*) but not for small projects”.

This is disappointing. It appears to be supporting the Keating Review position in relation to sustainability assessment, and it contradicts other parts of the Sustainability Assessment section that call for sustainability assessment of small projects and PPPs.

In many respects, impacts from major projects are already properly scrutinized, and big proponents are well aware of their responsibilities. It is possible, in fact, that more serious cumulative impacts may result from many small projects, and from PPPs, than from so-called ‘major projects’.

### ***Recommendation***

***The Council believes that all recommendations relating to sustainability assessment made in the final strategy should be made explicitly relevant to small projects, and to PPPs.***

### **2. Institutional reform for sustainability assessment**

On page 36, the draft strategy makes the comment that:

“.. While Government will move to establish the institutional and legislative basis for sustainability assessment, it is proposed that transitionary arrangements be put in place..”

The Council’s view is that the transitional arrangements outlined on page 38 are unwieldy and unnecessarily burdensome for proponents. The draft strategy suggests that sustainability assessment will require separate assessments of proponent documentation to be undertaken by three Sustainability Assessment Units. It is further suggested that these units will “need to liaise closely with each other”. Without any legislative requirement for these Units to work in unison, the Council doubts that this arrangement will work in practice.

The Council also has deep concerns about the prospect of having the social impact assessment function based in the Department of Planning and Infrastructure. We do not believe that this is the

appropriate agency to have responsibility for social impact assessment – they do not have the skills, expertise nor commitment to social issues.

In addition, the draft strategy suggests that final assessment of documentation should be the prerogative of the Office of Major Projects (for social-economic-strategic issues) and the EPA (for environmental issues). With no hierarchically superior agency in place, it would appear to fall to Cabinet to synthesize the information presented to them by OMP and EPA. It is difficult to envisage how all this would work in practice.

As is stated in the above quote, the draft strategy commits the Government to move to establish the institutional and legislative basis for sustainability assessment. The Council believes that the final strategy must go beyond hinting at a new legislative/institutional framework, to present a fully-fledged reform proposal.

We believe that DPC already understands the alternative models that might be implemented. These were presented to an informal workshop in May 2002. In short, and as presented at the May workshop, they consist of:

**a. Empowering the EPA to carry out sustainability assessments.** This could be done by amending the EP Act so that the EPA can assess all impacts of a proposal, and amending the EPA's Environmental Impact Assessment (Part IV Division 1) Administrative Procedures 2002 to introduce the new level of "sustainability assessment." It would provide a mechanism for major proposals that raise significant social, economic and environmental issues to be subject to a sustainability assessment. As is presently the case, the Minister for the Environment, acting in consultation with other Ministers, would be the final decision-maker. Cabinet would resolve any dispute between these Ministers.

**b. Restructuring the EPA into a new agency with a broader focus on sustainability.** This agency could be renamed (for argument's sake) the Sustainability Commission. All assessments undertaken by the new agency would be sustainability assessments, which would address all significant social, economic and environmental factors raised by a proposal. It might be necessary to curtail the role of the Minister for the Environment as an appeals body and decision-maker under this option, given the broader scope of the Sustainability Commission's operations.

**c. Creation of a new Sustainability Commission.** Under this model, the EPA would continue to prepare reports on the environmental factors of the proposals it assesses. Other agencies (such as the Department of Planning and Infrastructure and the Department of State Development) would prepare reports on the social and environmental factors relevant to such proposals. The Sustainability Commission would then prepare an integrated report and set of recommendations for Government.

***The Council supports Option c, but all options are improvements over the current situation.***

It is clear that proponents are crying out for institutional reform that would enable them to present triple bottom line, sustainability assessment documentation for proposal approval. It is equally clear that current institutional arrangements do not allow for an efficient and effective approvals process. A robust new system, based on one of the models outlined above, would be a direct response to proponent concerns, and would produce a formidable legacy for this Government.

### 3. The need to develop institutional backing for ‘sustainability-led’ assessment

The Council accepts the internationally understood concept that sustainability assessment can be either EIA-driven or sustainability-led. These approaches to the task are substantially different, and are defined in more detail in the following table.

#### IMPLICATIONS OF TWO DIFFERENT APPROACHES TO SUSTAINABILITY ASSESSMENT

	<b>Type of Approach to Sustainability Assessment</b>	
<b>Issues</b>	<b>EIA-driven</b>	<b>Sustainability-led</b>
Relationship to other typologies	Sadler and Verheem (1996) “standard” model  Therivel and Partidario (1996) “consent-related” model	Sadler and Verheem (1996) “integrated” model  Therivel and Partidario (1996) “integrated” model
Role of Sustainability Assessment	Sustainability assessments are “done” to PPPs after the PPP has been proposed. Procedural steps are equivalent to project-EIA. Scoping, identification, prediction, evaluation and mitigation are reported on. A public document is produced.	The purpose of sustainability assessment is to integrate environmental considerations in to all stages of decision-making, before decisions are actually made. The objective is not the production of a report, but the provision of quick responses to decision-makers.
Origin of Methods Used	From project-EIA	From policy analysis
Most appropriate application	To PPPs that already go through an authorisation stage, and where they initiate projects and activities. Fits with the concept of ‘tiering’.  The approach is more likely to be applicable to plans and programs, than to policies.	To PPPs where the level of abstraction is relatively high, and where generality and uncertainty are pronounced.
Focus of Sustainability Assessment	<i>Ex-post</i> (ie focus is on assessing impacts of PPPs that have already been designed).	<i>Ex-ante</i> (ie focus is on considering environmental concerns during the design phases of PPPs)

The choice of an approach to sustainability assessment by proponents has a profound impact on how proposals are developed, how they might be assessed by Government, and how they might use stakeholder input/public consultation. Current institutional arrangements in WA do not support the use of a sustainability-led approach to sustainability assessment.

A good example of this problem is presented in the work that Chevron-Texaco has undertaken on the Gorgon offshore gas proposal. The restrictions of PartIV of the EP Act, and the EPBC Act,

have forced the proponents to present a formed proposal that does not allow for the proper evaluation of alternative processing sites. A sustainability-led approach, with appropriate institutional backing, would encourage proponents to involve stakeholders in the analysis of alternatives all the way through the proposal design, and government approval processes. In this way, sustainability assessment would focus on ex-ante evaluation, rather than the ex-post arrangement that currently exists in WA.

### ***Recommendation***

***The Council recommends that the strategy should discuss the significance of the distinction between EIA-driven and sustainability-led assessment, and should develop institutional arrangements that support sustainability-led assessment.***

## **4. Other detailed comments**

### **Comments on Table 2: Possible criteria for sustainability assessment...**

In the promoting the positive column:

- The idea that we have to be providing short and long term economic gain seems to imply economic growth rather than progress.
- What is meant by ‘sense of place’? And how would that become part of a sustainability assessment process? Perhaps ‘sense of community’ is a more inclusive and expansive concept?
- Ensuring there are “acceptable levels of risk with adaptation processes” is an interesting concept in relation to the precautionary principle. How is an acceptable level of risk defined, and by whom?

The opening statement is fairly comprehensive and seems to be quite good. However, we have reservations about the term “net benefit”. This implies that if the economic benefits far outweigh the environmental and social problems a project/program etc could go ahead, even if the environmental/social issues are significant. The statement should be modified to “provide net environmental, social and economic benefits”.

The draft strategy suggests that each agency should develop checklists for their own internal sustainability assessments. We believe that there would be better consistency across government if a checklist was developed centrally that can then simply be modified by agencies as required.

The indicator specified is relatively meaningless. How can it be measured? The extent to which sustainability assessment is used eg the % of programs/policies/projects etc that are subjected to sustainability assessment would be more useful.

**Attached :** NRM Chapter  
Sustainable Forestry  
Greenhouse Gas Emissions  
CCWA Submission on Statutory Authorities Under the CALM Act  
Notes from Sustainability Forum Sessions  
Institutional Arrangements for Sustainable Marine Management



## Draft State Sustainability Strategy Comment on Natural Resources Chapter

### Decline in importance of the natural resources sector in WA's economy

The contribution of natural resources to WA's economy is declining. Yet the draft SSS (page 93) states that much of WA's wealth and sense of identity comes from the use of natural resources. Perhaps our sense of identity is founded on a myth. The present contribution of natural resources sectors is illustrated in figures 1 and 2.

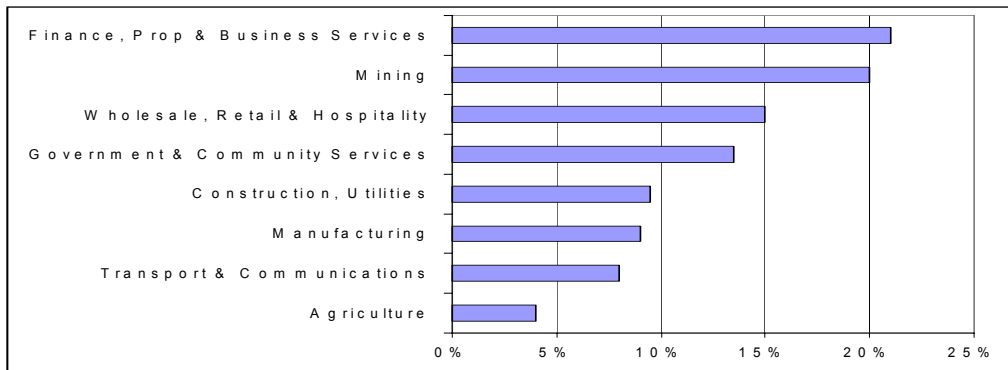


Figure 1. Gross State Product contribution of natural resources sectors relative to other sectors of the WA economy (Source: ABS and DoIT).

In addition to highlighting the declining importance of the natural resources sectors to the WA economy the SSS must also make recommendations on the extraordinarily low value of royalties generated by the mining sector. Relative to the annual value of mineral exports WA is receiving an annual average return of only 3.75% (Source: DRD). Such a rate of return must be seen as a failure in serious economic assessment. Sustainability assessment must not allow our mineral wealth to be exported at an excessively cheap rate.

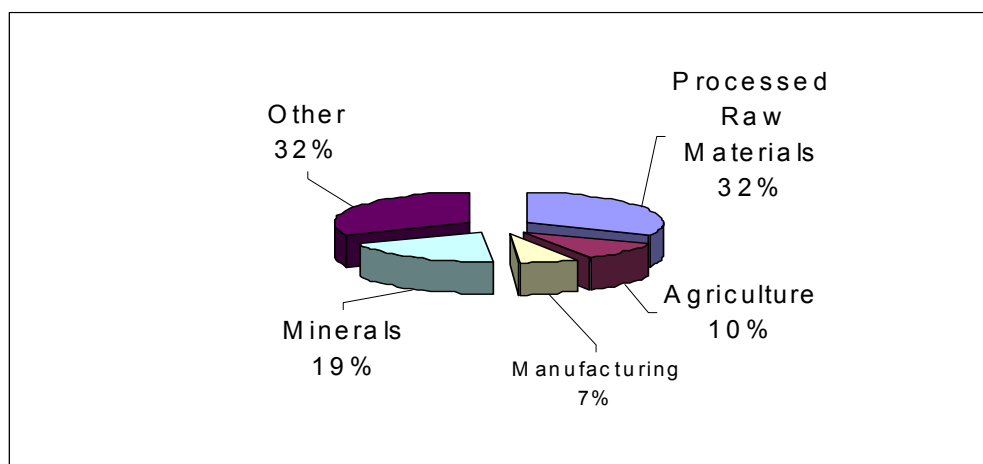


Figure 2. WA's exports: percentage contribution by sector (Source: ABS and DoIT)

## **Vision**

The vision should be stronger in respect to biodiversity, that is, biodiversity should be 'conserved' not just managed and used sustainably as in the current draft.

## **SPPs**

The SPP approach has severe limitations for environmental protection (e.g. they are not retrospective; are not 'whole of gov't'; and they only deal with territory that planning has jurisdiction over - i.e. not marine or federal lands).

Also there should be a requirement that TPS' that have already been approved need to incorporate the new SPP provisions within a set timeframe (with resourcing to help this occur).

## **Environmental Protection Policies**

Page 94 of the draft SSS mentions Environmental Protection Policies, using the example of Cockburn Sound EPP, as a reflection of community values. While EPP's have the force of law, the reality is that due to pressure from vested interests EPPs are generally weak and without the teeth they could have. In addition due to lack of resources for the EPA EPPs take a long time to develop and very few are actually in place and being enforced.

## **The SSS must make reference to WA's NRM history**

In developing a sustainable future for WA's natural resources there must first be recognition that WA has a history of natural resource mismanagement. The SSS must begin with the reminder that in <200 years Western Australians have been guilty of vast environmental degradation. The degradation of the wheat belt and rangelands are obvious examples. Many of the mistakes of the past were exacerbated because so called 'development' occurred at a rate that was much quicker than the rate at which degradation became apparent. The clearing of native vegetation for broad acre agriculture is an example of this problem.

Native vegetation mismanagement has been an especially dismal part of WA's NRM history. This is illustrated by the following facts:

- 25 shires have between none and 10% native vegetation cover;
- 22 shires have between 10% and 20% native vegetation cover; and
- 68% of the 305 Beard's vegetation complexes found in SW of WA have less than 30% of their original area remaining (Source DEP GIS Branch).

Native vegetation mismanagement must be considered in the context of Western Australia's unique natural heritage values. There are many ways in which these values can be expressed. Three indicators are:

1. South-west of Western Australia is one of the world's 25 biodiversity hotspots (Myers *et al* 2000);
2. Much of the region has species numbers in the order of 80 - 100 species per 10 metre by 10 metre square quadrat. In some areas, such as Mt Lesueur, the number of species is as high as 120; and
3. The species turn-over rate in adjacent survey quadrats is frequently above 60%.

## **WA agriculture – not currently sustainable**

The draft avoids the big issue for rural areas and sustainability – some areas can no longer be broadacre farmed and are currently unsustainable. This must be acknowledged and dealt with if we are to achieve a sustainable future for WA.

We would be concerned if the principles for sustainable agriculture as outlined in the draft were adopted.

The “principles for sustainable agriculture” outlined in the draft are:

- farm productivity is sustained or enhanced over the long term
- adverse impacts on the natural resource base of agricultural and associated ecosystems are ameliorated, minimised or avoided
- residues resulting from the use of chemicals in agriculture are minimised”

These principles are skewed. Why must farm productivity be sustained **or enhanced** while ecosystems need not be similarly protected or improved? Why is it acceptable that chemical residues may build up, as long as they are **minimised**?

Much has been written and said about the likely loss of 6 million hectares of previously arable wheat belt land to salinity. This has led to the view that deep-rooted crops must be part of a sustainable future wheat belt landscape. Intensive effort must be made to develop sustainable agricultural systems based on deep-rooted vegetation.

It should be noted that sustainable agricultural systems can not rely on transporting millions of tonnes of lime from the coast to the wheat belt, to counter soil acidification. Nor can it rely on gypsum mined from protected areas or areas of remnant native vegetation.

The problems of non-wetting soils have not been mentioned in the draft SSS.

The draft says that “In May 2001, the government announced an interim 5 year moratorium on the commercial production of GM Food crops to allow issues associated with market impacts, identity preservation and the feasibility, risks and benefits of establishing GM and GM-free zones to be fully debated in the community.”

Although it is mentioned at page 98, it really should be noted that this is merely a State Government commitment. Although it may have some weight politically, this commitment does nothing to prevent the (Commonwealth) Office of the Gene Technology Regulator approving GM Food production by corporations (as distinct from any other legal entity). Even if the State Government wanted some GM-free zones, they would be subject to the approval of the Ministerial Council set up under the GT Act.

## **Sustainable fisheries and aquaculture**

The draft says “Overexploitation of our natural biological resources can compromise sustainability.”

This is either a typographical error or a misunderstanding – exploitation of our natural biological resources can compromise sustainability, whereas overexploitation **does** compromise sustainability.

The draft goes on to say “The sustainability of fish stocks and conservation of their habitats are desired government outcomes reflected in the *Fish Resources Management Act 1994*. The objects of this Act are consistent with sustainability objectives and guiding principles.”

The *Fish Resources Management Act 1994* is designed around fish stocks and their habitats, not biodiversity conservation per se. The interaction between this Act and the *Wildlife Conservation Act* is unsatisfactory – recreational fishing, for example, currently involves unlawful taking under the WCA and there seems very little interest in the relevant agencies to deal with this loophole.

“The Conservation Commission of Western Australia and the Department of Conservation and Land Management have responsibility for the conservation of marine mammals such as dugong, seals, whales and turtles.

Responsibility for management of populations of all other marine organisms is the responsibility of the Department of Fisheries under the *Fish Resources Management Act*.”

This is unacceptable. Biodiversity conservation should be overseen by CALM in the first instance, and licences should be issued to particular fisheries if and when they produce management plans based on sustainability criteria. This is analogous to the Commonwealth model operating for export fisheries under the *Environment Protection and Biodiversity Conservation Act*.

“Six Marine Parks have been established, including the Ningaloo Marine Park, and one Marine Nature Reserve has been established at Hamelin Pool.”

But there have been no new marine parks in WA since 1990!

### **Sustainable Mining and Petroleum Production**

The draft says “The problem of over consumption of resources would not be assisted at all by stopping resources development. This can only be addressed by consumers and by eliminating processes that support over consumption, not those who extract the resources. Global processes to reduce consumption through eco-efficiency and lifestyle changes are underway but in the short to medium term there is growing demand for non-renewable resources.”

This is a glaring error and a major omission from the draft strategy as a whole. It is absolutely clear that constricting access to non-renewables would reduce over consumption, particular in the area of consumer non-essentials like gold. It is agreed that there are processes that support over consumption – why does the draft strategy not deal with them? What are the global lifestyle changes that are supposedly reducing consumption? Why does the draft strategy encourage such lifestyle changes?

### **HISMELT technology**

Bringing a new smelter on-line will increase WA’s greenhouse emissions. It is not relevant that other countries’ emissions may be lower unless we are actually trading entitlements with them, and obviously we can’t without Kyoto being ratified.

The use of HISMELT as an example of good natural resource management is highly inappropriate. HISMELT and mining companies and mineral processors should guarantee that their product will not compete with recycled product. Where the cost of present recycling technology does not compare favourably with the cost of freshly extracted product, it is suggested that the company

should develop a mechanism to ensure that recycled product has preferential access to markets, ahead of, for example, HISMELT's freshly extracted product.

## **Coasts**

The SSS must seek a fundamental change to coastal planning and management in Western Australia, including the cessation of the existing speculator-driven development approvals process. A new planning regime is needed that delivers a legally-binding, holistic, scientifically informed, and environmentally sustainable planning and management system. This must protect the inherently fragile coastal zone and reflect the high cultural significance placed on all coastal areas by the majority of Western Australians.

The WA Coastal Planning Coalition last year commissioned a report on coastal planning by Michael Barker – this makes a series of recommendations for coastal planning reform. We strongly recommend that this report be considered when developing the final strategy.

The Marine Conservation Strategy Group has developed a model of institutional arrangement for the sustainable management of the marine environment – see separate chapter.

## **Sustainable rangelands management**

Arid and semi-arid lands are not just 'rangelands' – that term reflects the human use of only part of such areas.

"The government has established a broad-based 'Pastoralism for Sustainability' Working Group to achieve sustainable land management on pastoral rangelands and ways to achieve nature conservation outcomes on pastoral lands."

It is wildly opportunistic to think that this group who have to report in June 2003 will achieve sustainable land management – the best it can do is make recommendations to government on the way forward. The draft strategy should look beyond this group to drive sustainable rangeland management and make strong recommendations for the way forward.

Like most of the vision statements, objectives, proposed actions and indicators in the draft strategy – those in the rangeland section are ad hoc, are not comprehensive and miss the point. The draft does not adequately address the issue of monitoring, sustainable land management, off reserve conservation, legislative amendments in order to achieve sustainable management, stewardship or diversification. The proportion of pastoral area under approved environmental management plans is not an adequate indicator – there is no guarantee that these are being implemented.

For comments on Forestry Management see separate attachment.

## SUSTAINABLE FORESTRY AND PLANTATIONS

**The Western Australian Government has moved to end logging in old growth forests on public land and is proceeding to incorporate these areas into secure conservation reserves, including 30 new National Parks. As part of this process the government has put in place programs to restructure the timber industries to maintain social capital and regional development opportunities. This \$136 million package is an essential part of how sustainability applies to forests.**

The Conservation Council welcomes the progress that has been made towards protecting old growth forests and creating new conservation reserves. The ALP also has a policy commitment to provide assistance and incentives to the plantation industry, which is where the future of sustainable wood production lies. However, government support for the plantation industry lags far behind the support being given to the native forest logging industry. In fact, the current policy is one of on-going subsidisation of the native forest logging industry (see Appendix 1 below), which after a century of over-exploitation is in terminal decline.

*Increasing global attention is being directed to our attempts to save forests, create habitat for rare and endangered species, manage feral animals and weeds. Can this become a new economic opportunity for the State? How can this help communities in rural areas?*

Environmental Alliance

Western Australia's public forests and timber reserves are vested with the Conservation Commission of Western Australia. The Conservation Commission has prepared a new draft Forest Management Plan which is currently available for public comment. The government is committed to maintaining the ecological integrity of forests and woodlands, and will achieve this through the application of ecological sustainable forest management principles. This draft Plan proposes further change as ecologically sustainable forest management becomes institutionalised.

Without significant amendments, the draft FMP will not introduce ecologically sustainable forest management (see Attachment 1).

If there is acceptance by the public and within government of the proposals in the draft Plan, Western Australia will cement its position on the path to sustainability with respect of forest management.

Without significant amendments, the draft FMP would not introduce ecologically sustainable forest management (see Attachment 1).

The draft Forest Management Plan proposes substantial change in the manner in which decisions are made on levels of log extraction from native forests.

*As long as the agencies persist in the myth that they are merely 'harvesting' our native forests, they will never achieve ecologically sustainable forest management. How can they 'harvest' what they did not plant and what our descendants are unlikely ever to see again as replacement for what are being cutting down (centuries-old trees)? How can the total destruction of entire ecosystems in order to extract a small volume of one component be called 'harvesting'?*

The draft

Plan proposes a shift away from timber allocation based on the concept of Maximum Sustained Yield to incorporate some buffering and allowing room for error based on the precautionary principle.

The shift must be far greater than proposed in the FMP if forest management is to become ecologically sustainable and be truly precautionary (see Attachment 1).

A second proposal is that the forests be managed according to the concept of adaptive management, with all that entails.

DCLM has claimed to be practising adaptive management for many years. Adaptation that would impede current logging and burning policies and practices either does not happen or, if it does, is far too slow.

Further research and monitoring to improve the knowledge base underpinning on-going management decisions will be required. The proposals are consistent with the precautionary principle.

Potentially the greatest single threat to biodiversity values in the South West, *Phytophthora cinnamomi*, sometimes referred to as jarrah dieback, is estimated to impact around 2,000 species of native plants and to cause major, permanent and irreversible changes to vegetation structure and habitat values for native animal species. Other species of *Phytophthora*, species of *Armillaria*, and a range of insect pests also cause significant damage.

What is *Armillaria*? Do the writers mean *Armillaria*, a fungal pathogen that is a serious problem especially in regrowth karri which has been hidden and down-played by CALM/DCLM for decades? The Conservation Council would argue that climate change is as great a threat to biodiversity as *Phytophthora cinnamomi*, or even a greater threat, especially as its impacts compound with the impacts of disease, fire, introduced plants and animals, and ecosystem destruction and fragmentation.

*Phytophthora* species continue to pose a significant risk to the sustainability of forests in Western Australia. Disease management needs a strong commitment, such as rigorous controls on movement of vehicles and other vectors into likely uninfected areas, including those in State Forest and Timber Reserves, National Parks and Nature Reserves in the South West.

***DCLM's latest dieback protocol (identifying native vegetation as infested/uninfested/uninterpretable and protectable/unprotectable and writing off all but what is identified as uninfested and unprotectable) is a capitulation to the disease that must be replaced by upgraded hygiene controls, including a ban on logging operations in wet soil conditions, which must be strictly enforced.***

A commitment to rehabilitation of areas degraded by *Phytophthora* is also required.

Any rehabilitation must be preceded by wide community consultation and involve the use of endemic species only.

The forest plantation industry has an important role to play in the future sustainability of the State. Plantations have the potential to produce timber to substitute for the declining production from native forest. In addition, plantations can help deal with salinity and other land degradation issues and, if placed correctly with appropriate species can help restore biodiversity values, especially through linking existing conservation reserves and other remnant vegetation.

The Forest Products Commission has developed a Plantation Strategy for the South West which includes oil mallees, hardwoods, maritime pines and blue gums.

The FPC's plantation strategy for maritime pines is being implemented without adequate research into species, soil types, rainfall or future markets (see Attachment 2).

The Small Tree Farm at Balingup has also been working to encourage productive revegetation of cleared farming land. They have developed a hybrid line of eucalypts that are suitable for sawlog production, referred to as 'fat eucalypts'.

The sandalwood industry has considerable potential to contribute to diversification in the rangelands. The opportunities that the sandalwood industry provides for diversification should be reviewed.

CALM's entrenching of a monopoly operator in the sandalwood industry was ill advised and is a cause of concern.

Such a review would oversee the development of an integrated business and resource management plan that ensures the resource is managed on an ecologically sustainable basis, that maximises environmental, social, regional development benefits as well as providing adequate financial returns to the state. The review should also examine and report on mechanisms to support further development of sandalwood plantations in the agricultural region. The Forest Products Commission has commenced trials with pastoral leaseholders to reduce and where possible eliminate feral goats from sandalwood production areas.

As for other sustainability issues, there will be an ongoing need to continue to involve the community in the planning and decision-making in relation to forest management.

DCLM has a long way to go before it achieves genuine community consultation. It equates briefing with consultation and is loath to relinquish any part of total control over any activity in which it is involved.

## Vision

Western Australia's native broadleaf forests are managed on an ecologically sustainable basis that includes a wide range of uses, all of which reflect the unique values of these forests.

WA's native broadleaf forests are NOT managed on an ecologically sustainable basis for any use. They are still being completely removed for the usual range of uses (urban development, infrastructure, farming). Loggable forest continues to be cut at unsustainable rates using unsustainable methods (clearfelling followed by intense regeneration burns; thinning in the vain hope of improving the production of sawlogs). Forest, along with all other vegetation types, continues to be burnt at frequencies and intensities that have already caused local extinctions and will inevitably cause more.

Regeneration of native forests is also a major focus, with strong community involvement. Production of sawlogs, pulpwood and other timber products from sustainably managed plantations is integrated with native forest use.

There is no evidence that plantations are currently being managed sustainably. Plantation sawn timber is in direct competition with native forest sawn timber yet is severely disadvantaged in terms of pricing, marketing and government support (see Attachment 3).



Rural communities have adjusted to support the changed focus in use and management of native forests and the on-going development of plantations throughout the South West, including their uses in restoring degraded landscapes. Woodlands and sandalwood resources are also used and managed sustainably, with sandalwood production providing the basis for a new industry in the rangelands.

## Objective

- Ensure that Western Australia's forests, woodlands and sandalwood resources are managed according to sustainability principles.

## Actions under way include

- The Conservation Commission has prepared a Draft Forest Management Plan incorporating Ecologically Sustainable Forest Management Principles, which has been made available for public comment.

The draft Forest Management Plan does NOT incorporate the principles of ecologically sustainable forest management (see Attachment 1).

- The government has protected all old growth forests and has created thirty additional National Parks and reserves to expand the conservation estate in the forested South West.

Old growth forests will not be protected until they become gazetted as conservation reserves, and none of the 30 promised new national parks has yet been gazetted. Although there have been significant improvements in proposed park boundaries, further changes are needed to incorporate the maximum area of old growth forest into the conservation estate (see Attachment 4, to be provided later).

- The Forest Products Commission has developed a Plantation Strategy for the South West.
- An agreement to develop a LVL plant from the Gnangara pine plantation creating over 100 jobs and improved ground water management possibilities.

*This agreement appears to have repeated the serious flaws in previous such 'agreements', to the detriment of the WA economy, society and environment. Once again a very large public resource (26 per cent of public pine logs) of significant commercial value (high-pruned mature pine trees capable of producing sawlogs) has been committed to a favoured influential company (Wesbeam) for an extraordinarily long time (25 years with the possibility of a 25-year extension) at very low prices (40 per cent below eastern states prices) with a big government subsidy (exemption from stamp duty, government funding for infrastructure).*

## Proposed actions

3.17 Continue to support restructuring of the timber industry, giving particular support to value-adding opportunities in the timber processing and wood working areas.

3.18 Promote the efficient use of all logs, development of high value-added timber utilisation, and logging rotations based on maintaining the full range of forest values including saw log production.

The correct word is 'logging'. For appropriate logging rotations, see Attachment 1. Cutting three or four jarrah logs to obtain one of sawlog quality suggests that jarrah forest logging does not have an economic future. Cutting nine marri logs in order to obtain one marri sawlog is totally unsustainable and unacceptable.

3.19 Actively support the Action Plan for Tree Farming in Western Australia for the further development of a plantation industry on previously cleared agricultural land within the guidelines being developed by the Western Australian Planning Commission to retain viable rural communities. Particular attention should be given to production of sawlogs as a substitute for the declining yield from native forests.

The emphasis is still far too heavily on the production of chiplogs for the export market. The ridiculously low price for native forest sawlogs is one of the main reasons the production of plantation sawlogs continues to languish. This situation must be redressed as a matter of urgency. A royalty review is one of the Government's policy commitments.

3.20 Continue to consult with communities over the final boundaries on the 30 new National Parks in old growth forests.

Some of the proposed national parks should become (or remain) Class A nature reserves (Whicher, Perup).

3.21 Review the sandalwood industry in Western Australia, the present and projected resource availability, the manner and pattern of exploitation of the resource, and the role that it might play in regional development and ecologically sustainable management of the rangelands. Develop a sandalwood management plan that is consistent with principles of Ecologically Sustainable Forest Management.

3.22 Seek to minimise the loss of natural values from State Forests and Timber Reserves and all other reserve categories within the South West as a consequence of the extraction of low value bulk commodities such as sand and gravel.

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- 3.23 Create a comprehensive Dieback Strategy including how to:
- Establish and maintain a comprehensive database on the distribution of *Phytophthora* species throughout the South West, and use this to ensure that future logging operations and other activities do not lead to the spread of these pathogens.
  - Develop and implement rehabilitation plans for selected diseases-affected areas.
  - Ensure the Western Australian nursery industry follows best-practice hygiene procedures to eliminate *Phytophthora* species from all seedlings and propagating material.
  - Work with relevant Commonwealth agencies to prevent the introduction of new plant diseases into Australia that could impact on the forests and forestry industry.

- Develop an education program for the general public, and private and public organisations whose activities involve use of land in dieback susceptible areas.
- Support the establishment of a Centre of Excellence for *Phytophthora* research into ecological impacts on key elements of the biota, methods of managing and counteracting impacts of diseases, and monitoring spread.

See comments on *Phytophthora cinnamomi* above.

3.24 Continue to develop skills in production and marketing of fine timber products made from specialty native hardwoods.

No specialty native hardwoods should be produced until there is a management plan for each species and it has been demonstrated that such production is ecologically sustainable.

3.25 Support accreditation of forestry and plantations as an important part of maintaining sustainable forest management in Western Australia.

Accreditation by the Forest Stewardship Council is acceptable. Accreditation by the Australian Forestry Standard is not. The AFS is unacceptable because of the lack of non-government involvement in its development and:

4.3.2 inadequacy in relation to native forest conversion. Under section 4.3.2 forest conversion is allowable with some exceptions. Among other things, it allows for the conversion of old-growth forests (except those that are 'rare or depleted within a forest ecosystem');

4.3.3 the high level of uncertainty as to what the measures are to maintain 'significant biological diversity values'. A lot is left up to the interpretation of the auditor. We believe that the FSC is stronger on these two issues, which are of major importance to forest management in Australia.

In addition the AFS

4.3.6 allows for the use of GMOs;

4.5.5 is weak regarding the use of pesticides. The AFS states 'Appropriate actions might include' and then lists things that the forest manager 'might' do, ie there is a lack of prescription.

### Indicators and targets

All Western Australian public forests are subject to Forest Management Plans that are approved by the Minister for the Environment on the advice of the Environmental Protection Authority.

It is one thing to have Forest Management Plans. It is another to implement them. The WA Supreme Court has found that CALM/DCLM is not legally bound to comply with a forest management plan. Until the environmental protection provisions of FMPs are made legally binding, they provide no assurance that forests are managed in accordance with the plans or with the principles of ESFM incorporated in the plans.

### Global opportunities

The decision to stop the logging of old growth forests in the South West of Western Australia and a move towards sustainable forest management has attracted interest from around the world. When fully implemented, monitored and evaluated, this area of sustainability will be of considerable

global value as the world's forests continue to decline at an alarming rate.

As pointed out above and in the attachments, WA has a long way to go before it achieves ESFM.

### Further information

Forest Products Commission

<<http://www.fpc.wa.gov.au>>

Draft Forest Management Plan for Western Australia

<http://www.conservation.wa.gov.au>

### Appendix 1

In a letter, reference F.103 of 10<sup>th</sup> February 2003 from Mr Peter Beatty on behalf of Dr Paul Biggs, General Manager of the FPC, to Mr Kim Redman of the Natural Environment Society, Bridgetown, Mr Beatty made the extraordinary statement that:

“I am unable to provide a detailed or meaningful figure on what financial return the State receives for its native forest industry.”

This statement confirms our view that native forest logging is operated at a loss to taxpayers. The only question is the extent of that loss. If the head of the agency legally charged with selling forest products at a profit for the State is unable to say what financial return the State receives for those products, there is something seriously wrong with both the agency and its processes.

It has been claimed that when a forest is logged this is recorded as a loss. FPC's accounts Note 8 records for year 2001 “Native Forest Natural Resource Asset value \$0” and Note 22 records for 2001 “Native Forest Standing Timber value \$0”. That is zero value was placed on this asset at the beginning of 2002, so how could this value be written off? (Elsewhere the accounts show the value of native forests was written up by \$66.5 million.)

It has been claimed that a net increase/decrease in the FPC's Statement of Financial Performance is a direct increase/decrease in the value of these operations to the people of Western Australia. But how can this be ascertained in relation to native forestry when the FPC's accounts do not separate the financial results for native forestry from those of plantations, sandalwood and nursery operations? As well, it is widely acknowledged that there are many forestry-related costs which are not met by the FPC but which are a financial burden to the state.

It has been claimed that “the commercial effects of the State's logging programs are clearly visible and reflected in the FPC's accounts, as are the dividends and capital growth ...”. This is not so. The FPC's accounts do not separate the financials for logging, so how can this claim be verified? FPC's accounts show that for the year 2002, assets grew from \$225m to \$240m, but this included a write-up of the native forest asset from \$0 to \$66.5m. Was this increase in value of this asset due to logging it? In respect of “dividends”, note 37 of the FPC accounts shows a dividend paid of \$0 (\$zero) but elsewhere (note 4.4) the “statutory dividend” was \$1.7m but this merely offset a “negative dividend” (as shown in the accounts) for the previous year. Is this apparent correction to some past accounting error offered as evidence of the profitability of logging native forests?

## **WA State Sustainability Strategy – with particular reference to Greenhouse Gas Emissions**

### **GLOBAL SUSTAINABILITY: Greenhouse**

Reference is made to global sustainability and greenhouse. The Conservation Council is of the view that this section should place a much stronger emphasis on the potential of renewable energy and energy efficiency as a mechanism for reducing greenhouse emissions.

In addition to promoting low greenhouse lifestyle options the State Government must demonstrate that it is prepared to require industry to act within the target of 108% of 1990 greenhouse gas emissions. If the Government fails to require that industry meet the 1990 Kyoto target then promotion of low greenhouse intensity lifestyle options will lack credibility with the broader Western Australian community.

An effective means of demonstrating that the Government is serious about climate change and greenhouse would be the introduction of a carbon tax. Good economic forecasting suggests that a carbon tax is highly likely. Enlightened corporates, such as BP say a carbon tax will come. Does it not then make good economic sense to start factoring this in? It has previously been mentioned that the cost gap between renewables and fossil fuels is closing – and this is without factoring in the externalities!

We note that in the recently released State Water Conservation Strategy it was recommended that prices for water and waste water treatment be adjusted to include externalities associated with water supply and wastewater treatment. Why should the same principles not apply to electricity generation?

### **Proposed Action 2.15**

Establish a voluntary program of Greenhouse Offsets to assist large development projects to reduce greenhouse gas emissions by investing in energy efficiency, renewable energy, carbon sequestration or other accredited projects in Western Australia.

Comments: Greenhouse offsets must be mandatory. The present State Government system could be described as a voluntary one. It has been a total failure. Proof of the failure of the present voluntary system is the fact that WA's greenhouse gas emissions are projected to grow from 49.3million tonnes of CO<sub>2</sub> –e in 1996 to 86million tonnes CO<sub>2</sub> –e by 2010. At a Commonwealth Government level the Greenhouse Challenge, a voluntary program, has also been an expensive failure.

### **Proposed Action 2.16**

Continue to require companies involved in major projects assessed by the Environmental Protection Authority, to minimise and report on greenhouse emissions.

**Comments:** The State Government must accept responsibility for emissions resulting from its own decision-making processes. It must use decision-making opportunities to stop approving greenhouse polluting industries. There is little point in simply reporting on emissions. The reporting must be linked to legally binding offset programs, and penalties should be severe for organisations who fail to comply with their offset agreements.

The Environmental Impact Assessment (EIA) process for proposals that involve greenhouse gas emissions must be dramatically overhauled. The EIA process should systematically reject

greenhouse gas emitting industries. The only exceptions to an EIA process rejection of a proposal would be for proposals that provide legally binding mechanisms for an auditable greenhouse gas emission reduction at the WA State level, at the national level and at the international level.

The Environmental Protection Authority's Guidance Statement on Greenhouse Gas Emissions is dreadfully weak. As this guidance statement impacts on the decision-making process it must be reviewed as a matter of urgency.

### **Proposed Action 2.17**

Facilitate a carbon sequestration facility through the Forest Products Commission to exploit the new market of carbon credits from the new carbon rights legislation.

**Comments:** The WA Government needs to exercise some caution with its carbon sequestration approach. The concept has some merit, but it should not be seen as anything more than an instrument in a panoply of greenhouse gas emission responses.

The Forest Products Commission predicts that by the year 2020, there will be 800,000 hectares of tree crops established on Western Australian farms  
[http://www.fpc.wa.gov.au/plantations\\_in\\_wa.html](http://www.fpc.wa.gov.au/plantations_in_wa.html) - history

In WA carbon sequestration capability varies depending on rainfall zone. On average it could be said that in WA carbon can be sequestered at the rate of 4 tonnes per hectare per annum "Forests as CO<sub>2</sub> Sinks - an opportunity for Forest Growers" Borough, C, Bourke, M and Bennett, D; Australian Forest Grower, Autumn 1998, Vol 21(1).

This means that 3.2 million tonnes of carbon could be sequestered each year on WA farms.

In view of this low level of carbon sequestration capacity in WA there is a need to develop a range of other greenhouse gas emission responses.

### **Proposed Action 2.18**

*'Investigate the potential for reducing greenhouse gas emissions for the government vehicle fleet...'*

**Comments:** Wording should be changed to read '*Reduce* greenhouse gas emissions from the Government vehicle fleet by ensuring the WA Government leads the way with the purchase and lease of vehicles that have the lowest possible greenhouse gas emissions. In 2003 best practice standards have been set by the Department for Planning and Infrastructure's purchase of Toyota Prius vehicles.

With regard to the electric train system, the operator should be required to source its full electricity requirement through Western Power's Natural Power program.

### **Proposed Action 2.19**

*'Maintain the commitment to ensuring that Greenhouse is a significant factor in power decisions.'*

**Comments:** This proposed action should be strengthened and reworded to read: '*Bring into force Government policies that advantage sustainable energy technologies, so that WA can significantly reduce its greenhouse gas emissions.'*

The transitional phase of the journey towards a renewable energy future should see Western Australia leading the way with a policy of having 30% of our electricity coming from renewables, 30% coming from gas and 30% coming from coal and the remaining 10% removed through demand management measures.

There need to be:

- Strict greenhouse targets set for each sector of the WA economy
- Strict renewable energy generation targets should be set for each sector
- Government targets to be established, and easily open to public scrutiny.

In addition to promoting low greenhouse lifestyle options the State Government must demonstrate that it is prepared to require industry to act within the target of 108% of 1990 greenhouse gas emissions. If the Government fails to require industry meet the 1990 target then promotion of low greenhouse intensity lifestyle options will lack credibility with the broader Western Australian community.

An effective means of demonstrating that the Government is serious about climate change and greenhouse would be the introduction of a carbon tax. Good economic forecasting suggests that a carbon tax is highly likely. Does it not then make good economic sense to start factoring this in? It has previously been mentioned that the cost gap between renewables and fossil fuels is closing – and this is without factoring in the externalities!

We note that in the recently released State Water Conservation Strategy it was recommended that prices for water and waste water treatment be adjusted to include externalities associated with water supply and wastewater treatment. Why should the same principles not apply to electricity generation?

### **Proposed Action 2.20**

*'Provide mechanisms in the electricity market structure for encouraging renewable energy and distributed generation, which could provide incentives to reduce line losses...'*

**Comments:** Priority should be given to a renewable energy access regime that allows Western Australia's renewable energy sector to develop renewable energy projects. A workable renewable energy access regime must allow independent renewable energy producers to benefit from the opportunities afforded by the Federal Government's MRET legislation. A vibrant renewable energy sector will provide jobs and opportunities that could otherwise leave WA.

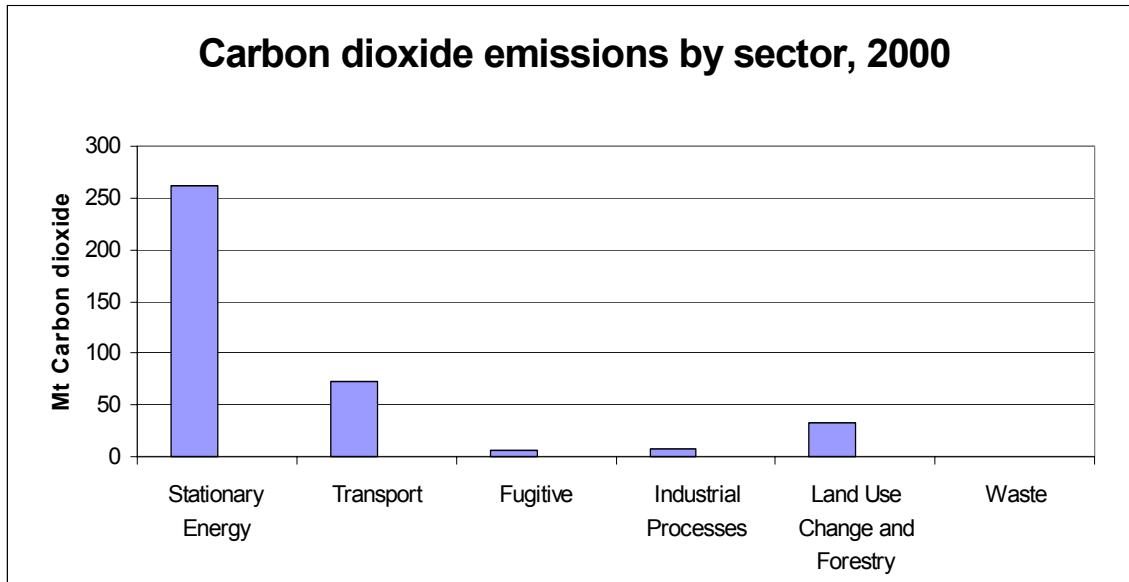
While some of the improvements proposed under the current electricity reforms are in line with *Proposed Action 2.20* such as, an interim renewable energy access regime and the requirement on electricity retailers to purchase a percentage of their electricity from renewable energy generators, other proposals will act against this Action. For example, the implementation of a single line use charge will reduce the incentive for dispersed generation and the maintenance of the uniform tariff will similarly stop the implementation of sustainable energy options for the remote grid / end of feeder.

Other strategies currently in place such as barring renewable energy from participating in the power procurement process also discriminates against the adoption of sustainable energy and acts to maintain the status quo. This process needs to be modified to allow sustainable energy practices to participate in the procurement of the states long term energy requirements.

Also the favouring of large scale coal fired power stations, within the power procurement process acts to reinforce an electricity network that is not conducive to the introduction of sustainable

energy solutions as they can't operate in a manner that allows the integration of variable sustainable energy generators. This issue needs to be examined and addressed in the power procurement process.

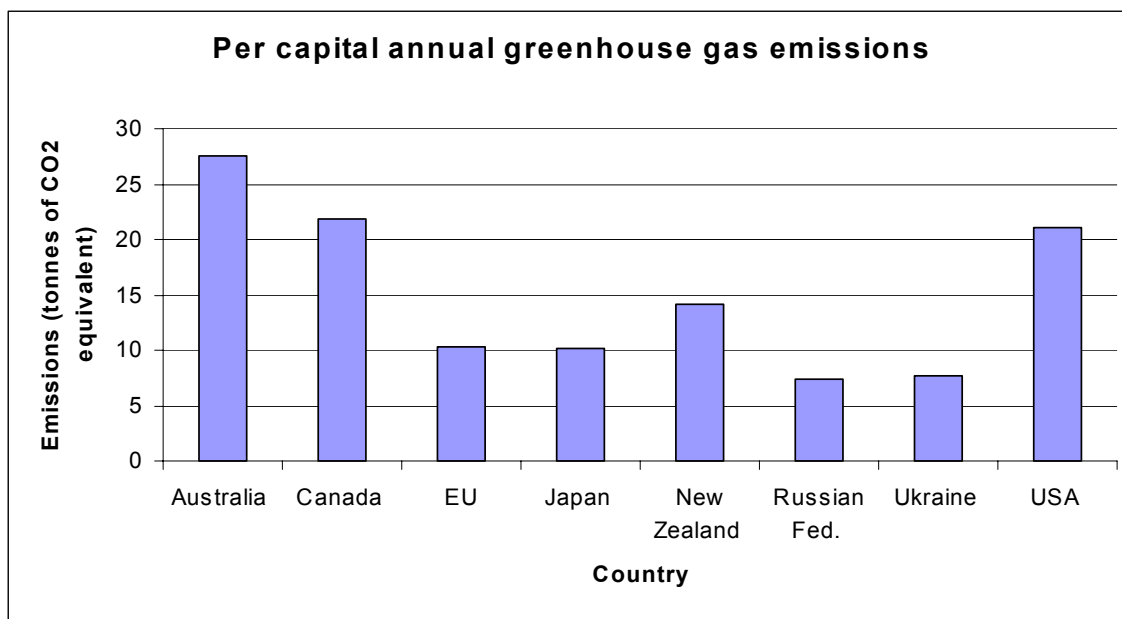
In its report 'National Greenhouse Gas Inventory – Analysis of Trends and Greenhouse Indicators 1990 – 2000' the Australian Greenhouse Office has shown that stationary electricity generation accounts for 68.7% of our carbon dioxide emissions and 49.3% of our carbon dioxide equivalent emissions. This situation is demonstrated in below.



*Figure. Showing that stationary electricity production accounts for 68.7% of carbon dioxide emissions (Source: Australian Greenhouse Office, 2002)*

Australians, on a *per capita* basis, are already the world's highest greenhouse gas emitters. We have a responsibility to proceed very carefully when determining how we will structure our electricity generation, distribution and marketing networks – as these will have a direct bearing on the speed with which we move away from fossil fuel based electricity generation.





*Figure. Showing that Australians are the world's highest greenhouse gas emitters on a per capita basis (Source: The Australia Institute, 2002)*

At a time when the global political situation is particularly volatile, the Australian Government should be seeking to ensure that Australians cannot be seen as a people who behave in an inequitable manner. Being the world's highest greenhouse gas emitters, on a per capita basis, could be perceived as a sign of nation that considers it has a right to pollute at a rate higher than other nations.

The situation in relation to Western Australian per capita Greenhouse emissions is far worse than the national situation.

### **Potential for renewable energy**

It is outrageous that at the moment renewables account for less than 1% of our energy supply. It must never be forgotten that Australia has an abundance of natural and renewable energy resources.

### **Economic Viability of renewable energy sources**

In relation to economic viability renewable energy sources, such as wind technology, are quickly gaining ground on fossil fuels, positioning themselves to be economically and environmentally superior. Furthermore, renewable industries are now being seen as effective means of meeting social criteria, because they have substantial job development capability. A recent Western Power document clearly indicated that wind is at 7-9 cents per kilowatt compared to 4-7 cents per kilowatt for gas and coal. This is an extremely important issue, as it highlights the potential for creating an energy mix that is both environmentally sound and economically viable.

Technology	Capital cost (\$/kw)	Total Cost (c/kw)
Wind	1,800	7 - 9
Solar PV	6,500	30 - 50
Biomass	2,500	8 - 12
Coal-fired Steam Turbine	1,500	4 - 7
Combined Cycle Gas Turbine	1,000	4 - 7
Open Cycle Gas Turbine	500	7 - 12

*Figure. Showing relative costs of electricity production (Source: Wester Power Corporation, Strategic Environmental Review, 2002)*

The Conservation Council can see the potential for genuine environmental benefits in a more competitive energy market, where renewables and demand management have the opportunity to compete fairly with other options for power supply.

**Proposed Action 2.21** *Establish an Adaptation Strategy for Climate Change with the Department of Conservation and Land Management, CSIRO Healthy Country and other relevant agencies.*

#### **Comments:**

In publishing its report 'Climate variability and change in south west Western Australia' IOCI has presented evidence that shows the south west of WA has suffered a significant decline in rainfall over the last hundred years. IOCI has come to the view that we must begin to adapt to a new climate regime. This is a matter that deserves very careful analysis. Without question the impacts of climate change will require enormous adaptive effort. Even if there were to be no further anthropogenic activity causing rises in atmospheric carbon dioxide levels we would still be required to take adaptive measures to manage the impacts of climate change on our natural ecosystems, agriculture, human health and settlement patterns.

#### **Adaptation vs prevention**

While acknowledging that some adaptation is already necessary, the State Government's first responsibility should be towards highlighting the consequences of inaction and indicating preventative actions that can be taken today. This way serious momentum can be developed so that Government can make properly informed decisions, and decide against further industries that cause high levels of greenhouse gas emissions. Instead we are being lulled into believing that we can adapt.

For biodiversity conservation, agriculture, and human health our climate change priority response should be prevention and mitigation. Climate protection should also be the priority for research funding, policy formulation and for guiding decision-making.

In the case of biodiversity conservation some adaptation management is already necessary. However, the chances of its success are far from good. There appears to be neither adequate funding nor sufficient knowledge to ensure the management and long-term survival of complex ecosystems that are threatened by climate change.

#### **What are we adapting to?**

A serious problem with the adaptation approach is the 'moving target nature' of the problem that we are endeavouring to adapt to. A most striking example of this problem is that no body knows what the atmospheric carbon dioxide concentration level is that we are endeavouring to adapt to.

Research, such as that undertaken by IOCI, has found a number of climatic relationships that change when thresholds are reached. Creating a climate model that takes account of threshold factors is extremely complex. This complexity further decreases the scope for developing an adequate adaptive management strategy.

A threshold response has occurred with the decline in rainfall in the south west of WA, where change has not been gradual, but more a switching to an alternative rainfall regime. Another area where a threshold response occurs is in the relationship between rainfall and sea surface temperatures. Research has found that the relationship becomes non-linear, with enhanced convection occurring at temperatures above 29 degrees Celsius.

### **Cost of adaptation**

The climatological modelling capacity that is being developed within the scientific climatological community is extremely impressive. The scientists involved clearly enjoy using their data to respond to “crackable problems”. They derive satisfaction when real life change matches their modelled predictions. In developing future careful attention should be given to determining the economic cost of adaptation.

This will require ensuring that groups like IOCI have the necessary economic expertise and access to epidemiological researchers. It may be that the cost of developing a vaccine for a vector borne disease could be more than the cost of simple enforcement of the deep cuts to greenhouse gas emissions that the environment movement has been calling for.

An adaptation strategy for the agricultural sector will involve significant financial risk. Through the Department of Agriculture the WA community could invest millions of dollars developing a new agricultural cropping system that can cope with decreased rainfall or summer rainfall, only to find that further degradation in climatic circumstances will surpass the tolerance limits of the newly developed system.

**Proposed Action 2.22** *Establish a carbon accounting system in accord with national and international systems to enable better understanding of greenhouse across government and the potential for various policy options.*

**Comments:** Yes, work with the Carbon accounting CRC.

**Proposed Action 2.23** *Create greenhouse accreditation for carbon accounting for carbon rights.*

**Comments:** Yes, but see response to 2.17

### **GLOBAL: Greenhouse**

The State Government should make Western Australia meet its proportional target contribution to Australia meeting its Kyoto Protocol targets for greenhouse gas emissions. This should include completing, funding and implementing a State Greenhouse Strategy. The State Government should also urge the Australian Commonwealth Government to ratify the Kyoto Protocol. It is understood that the WA Government may have recently received advice recommending that it is now in WA's economic interest to see the Kyoto Protocol ratified by the Commonwealth Government.

It is our moral obligation to take responsibility for contributing to reducing greenhouse gas emissions, it is also in our self interest to do so. This will be easier to achieve if Western Australia can trade carbon rights within Australia, and if Australia can trade carbon rights with countries, the

latter will not be possible unless Australia ratifies the Kyoto Protocol, which will provide the essential legally binding framework for the trading mechanisms that will be essential to reducing global greenhouse gas emissions.

Development of the WA economy should not be skewed to energy intense industries. Equal policy priority should be given to less greenhouse intense sectors of the WA economy, such as the Services sector.

24 January 2003

Alex Errington  
Consultant  
Review of the *Conservation and Land Management Act* 1984 Statutory Authorities  
PO BOX 501  
NEDLANDS WA 6909

Dear Mr Errington

## **REVIEW OF THE *CONSERVATION AND LAND MANAGEMENT ACT* 1984 STATUTORY AUTHORITIES**

Thank you for your letter dated 11 December and the opportunity to make a written submission to the above review. This letter sets out the position of the Conservation Council of WA ('the Council') on the *Conservation and Land Management Act* 1984 ('CLM Act') statutory authorities, and in particular makes a case for the **amalgamation** of the Marine Parks and Reserves Authority ('MPRA') and the Conservation Commission of WA ('CC') into an appropriately constituted and suitably resourced **Biodiversity Commission**.

As will be explained, the Council's position on this matter is designed to dovetail with the broader submission we will make on the proposed **Biodiversity Conservation Act** ('BCA'). As you are no doubt aware, the consultation paper on the proposed BCA calls for feedback "on the possible roles that the [CC] and the [MPRA] may be given under the [BCA]".

### **1. *Review of the statutory functions of each statutory authority, and the appropriateness / feasibility of incorporating those functions into the Department of Conservation and Land Management ('DCLM').***

#### **1.1 *Each statutory authority's functions***

The Council is pleased this review is being undertaken as we have been concerned for some time about the operation of these statutory authorities, particularly the MPRA. We believe, however, that the operations and effectiveness of the CC should also be considered, if not formally reviewed. While it is acknowledged that the CC has only been operating for around two years (see page 3 of the scoping document), in order to adequately evaluate the prospect of a merger, one must consider the operations of both bodies. It is also timely to consider the potential role of the CC under the proposed Biodiversity Conservation Act and subsequent Biodiversity Strategy if our proposal for the creation of a Biodiversity Commission is not accepted. Our comments on the operations and effectiveness of the CC are set out at Item 5 below.

We support in principle the current statutory functions of the authorities, however we believe that those functions are compromised by lack of resources, lack of support staff and a lack of independence from DCLM.

Our proposal for the establishment of a Biodiversity Commission would obviously require additional functions related to biodiversity conservation (see the discussion at Item 4 below).

While supporting in general the non-representative model for membership of these authorities we believe it is essential that members be required to have significant expertise, experience and qualifications in an area or areas relevant to the authority. We also believe that chairs of statutory authorities should always be independent of the Department that they audit or guide, and at very least should not be current employees of that Department.

### *1.2 Appropriateness / feasibility of incorporating each statutory authority's functions into the DCLM*

We strongly support the statement of Government policy about the vesting of conservation reserves “in a body with community membership that advises the Minister for the Environment and monitors and audits the manager of those lands and waters” (see page 3 of the scoping document).

We do not believe that it is either appropriate or feasible to incorporate the functions of these statutory authorities into DCLM or any other Government agency. These authorities are responsible for community resources and assets that require community oversight and involvement via a body that is independent from the relevant managing agency.

Whether or not the MPRA and the CC are amalgamated, maintaining separation from DCLM is consistent with page 2 of Annex 1 to the scoping document: the “proposed functions cannot be performed by a department or it would be inappropriate for them to be performed by a department.” Also on page 2 of Annex 1: “The avoidance of real or perceived conflicts of interest may be sufficient justification for the retention of a statutory authority.”

It is essential that an independent body is responsible for:

- overseeing the development of management plans for vested lands and waters;
- planning the management of vested lands and waters for which management plans are not required by legislation;
- overseeing the identification and prioritisation of candidate areas for marine, freshwater and terrestrial reserve systems as tools for biodiversity conservation;
- monitoring and auditing; and
- broad policy development and advice.

The Government should be commended for its election commitment to increase the independence of the MPRA. We believe our proposed Biodiversity Commission must have a high level of independence from DCLM – see further the discussion at Item 4 below.

## **2. *Review the operations and effectiveness of the MPRA***

### *2.1 Establishment, planning and management of a comprehensive marine conservation reserve system*

The Council is deeply disappointed with the lack of progress made in marine conservation since the 1994 Marine Parks and Reserves Selection Working Group Report (‘Wilson Report’), with over 70

recommended candidate areas, and the subsequent establishment of the MPRA in 1997. No new marine reserves have been established in Western Australia since 1990 and most proposed Indicative Management Plans ('IMPs') have not met basic conservation requirements. The Council has significant concerns about the Jurien Bay, Dampier Archipelago and the Monte Bello IMPs, believing that problems in the current legislation (see Item 2.2 below for further comment) have resulted in poor conservation outcomes. The management of existing reserves such as Shoalwater Islands has also been deficient.

In our opinion the MPRA has failed to significantly progress marine conservation in WA, but this slow going is largely due to ineffective legislation, lack of resources, inadequate policy (see below) and lack of commitment to marine conservation by Government. We are also concerned by the initial approach taken by the MPRA to progressing the establishment of marine reserves in WA and believe that it must be changed to a holistic one using bioregional marine planning.

An example of the inability of the MPRA to deliver is the failure to secure the recommended extension of the Ningaloo and Shark Bay Marine Parks. These proposed extensions were recommended in the Wilson Report and accepted by Government, yet they still have not been declared.

We are also concerned about the lack of progress in finalising management plans for the marine parks already in place. The Shoalwater Marine Park draft management plan was released for public comment in 1995 and is still not finalised. The Rowley Shoals Marine Park has no published plan, either draft or final. We were led to believe that this was due to objections from Fisheries, but remain unconvinced that was the sole reason.

The Council is also awaiting an MPRA review of DCLM's activities in the few Marine Reserves with final management plans – for example the Marmion Marine Park Management Plan was due for review last year and the Ningaloo Marine Park Management Plan fell due in 1999. We understand that the latter review has commenced, but that it is not likely to be completed until 2004.

The MPRA is still operating under the previous Government's *New Horizons* marine policy. This policy does not deliver an effective MPRA or marine reserve system, and therefore needs urgent review. More recent understanding and agreement over the necessity of regional marine planning, incorporating effective coastal and marine biodiversity protection, requires a speedier and broader planning system. Central to such a system is effective management integration between coastal land, intertidal, estuarine, island and marine interfaces and reserves. The MPRA, or whatever authority takes its place, will be required to take a stronger lead to create effective comprehensive, adequate and representative biodiversity outcomes.

## *2.2 Appropriateness of the relevant provisions of the Act*

The current legislation severely undermines the effectiveness and operations of the MPRA.

The requirement for concurrence of the Minister for Fisheries and Minister for State Development ('the Ministers') has seriously impeded the progress of marine reserves in WA. It is our experience that the DCLM has set lower conservation objectives and goals for a proposed marine reserve even before consultation with community and other agencies begins because they know they require the consent of those Ministers. The requirement for concurrence is now inconsistent with the change the Government recently implemented with respect to forest management. We strongly recommend that the requirement for concurrence of the Ministers in the case of marine reserves be removed from the Act as soon as possible.

The lack of independence of the MPRA from the agency, together with the lack of independent resources, has caused significant problems. The need for independence of these authorities was recognised when the CC was established, as was the need for the independence of the NPNCA before it (see, for example the report of the 1991 Legislative Assembly Select Committee into Land Conservation pages 67 to 72). The CC has its own budget, Director, executive support and an Audit Manager, all of whom report to the CC not the Department. When the Bill to create the CC was introduced into the Legislative Assembly the body was promised “resources to carry out its functions” (Hansard 25 November 1999, page 3856) which the then Minister Cheryl Edwardes undertook verbally would translate into up to 10 staff.

This is not the case for the MPRA. The MPRA remains dependent on DCLM for the limited executive support it receives, and on the cooperation of DCLM in order for it to carry out its audit and policy development functions. The small budget that it now has is insufficient for its statutory functions. An almost complete reliance on DCLM for information is another significant concern.

### *2.3 Authority’s relationship to and performance in liaising with relevant Government agencies and stakeholders*

We believe that because of the dependence of the MPRA on DCLM the relationship of the former with many agencies and stakeholders has been inadequate. Many stakeholders deal with DCLM rather than the MPRA on marine-related issues and rarely meet representatives of the MPRA. It is our understanding, on the other hand, that the CC’s relationship with agencies and stakeholders is substantially enhanced by its higher level of independence.

It is of course difficult to comment on the MPRA’s relations with other agencies and stakeholders. However it would appear to us that its relationship with the resource exploitation agencies and stakeholder groups is one of significant disparity in power.

### *2.4 Relationship of the Authority to Marine Parks and Reserves Scientific Advisory Committee (‘MPRSAC’)*

Given that the MPRSAC has not met over the last three years it is difficult to imagine that a relationship exists at all.

We believe that the MPRSAC should have been consulted extensively over the planning and design of proposed marine reserves, but this does not seem to be the case. In fact in the case of Jurien Bay we strongly recommended that the MPRSAC be used to help develop marine conservation objectives and zoning plans, but we understand that this did not take place in any significant way.

## **3. *Review the operations and effectiveness of the MPRSAC***

We should first congratulate the Government for undertaking this aspect of the review in the absence of a statutory requirement or relevant election commitment.

It is essential for both the MPRA and the CC to have access to independent special expertise. It is also essential that there is an independent chair for such a committee and resources to support such a group. The MPRSAC under the legislation is chaired by the DCLM and has several specific agency representatives. This has resulted in individuals acting in the interests of particular agencies, rather than working together to create the best scientific advice for various issues. It has already been noted above that the MPRSAC has not met in recent years and could well have played an important role in Jurien Bay.



While we continue to support the role of an independent scientific advisory body such as MPRSAC in marine conservation, we do not necessarily take the view that a separate statutory body is required. An alternative model would be the establishment of an independently chaired scientific advisory committee reporting directly to either the MPRA or, preferably, the BC.

In any event it is entirely inappropriate that the head of the DCLM Marine Conservation Branch is the Chair of the MPRSAC or that the Deputy Chair is from Fisheries; how can the community expect independent expert advice in such a situation?

**4. *Advise on the appropriateness, feasibility and desirability of amalgamating the CCWA and the MPRA***

In 1997 the Council supported the establishment of a separate body to progress marine conservation in WA. At that time the NPNCA was not adequately dealing with marine conservation issues, had few resources and was not independent of the then CALM. While the MPRA has focused attention on marine conservation-related issues it has failed to deliver marine conservation through the establishment of marine reserves or comprehensive marine policies. In addition, we are concerned about the need to better integrate planning and management across marine, freshwater and terrestrial ecosystems.

Islands and adjacent reserved coastal areas have separate management plans to their surrounding marine parks and management plans are created and reviewed separately, e.g., Reviews of Cape Range Management Plan and Ningaloo Marine Park Management Plan; Shoalwater Islands Management Plan and Shoalwater Islands Marine Park Draft Management Plan. There appears to be little evidence of joint management systems between the CC and the MPRA, or even regular meetings between the two bodies. While we appreciate that these problems occurred when solely the jurisdiction of the NPNCA and that scientific understanding of these interlinked ecosystems has improved dramatically over the last 5–10 years, integration appears to have deteriorated with the existence of the two bodies and their different administration systems and meeting times.

It must be emphasised that this lack of effective integration is in no small part due to the grossly inadequate resources provided to these authorities. But it is the Council's position that integration will be further enhanced by the amalgamation of the CC and the MPRA into a single body. Further, we strongly suggest that in addition to the current functions of CC and the MPRA, this new body, which we have called the Biodiversity Commission ('BC'), should be responsible for the planning and auditing of biodiversity-related activities across Government (and of DCLM in particular) and for the development of conservation policy in general.

This position is consistent with our anticipated submission on the BCA more generally, where we will be calling for a single agency (DCLM) to have the primary responsibility for implementing the planning determinations of the BC. In other words, resource exploitation agencies such as Fisheries should no longer be primarily responsible for marine biodiversity in WA.

In addition to the above, the new BC should have a broader planning and auditing function – DCLM will just enforce the law (along with the public, but this is not the appropriate forum to discuss third party enforcement) and manage the vested land. We believe that the planning and marine branches of DCLM should be transferred to the BC to allow for the comprehensive and independent planning of conservation reserves in WA. This, of course, will necessitate a BC that has significantly more resources than those provided to CC and MPRA put together.

Concerns about the potential for an inadequate focus on marine issues in an amalgamated body (see pages 3 and 4 of the scoping document) are justified, but can be addressed without the need for

separate vesting bodies. We propose that the BC will have a combination of (say, 9) permanent, multidisciplinary members plus additional part-time members with specialist expertise. The BC will then alternate between meetings of those permanent members and meetings of sub-committees dealing with issues such as the creation of a comprehensive marine reserve system for WA (in the latter case, the meetings would be comprised of two or three permanent BC members and an appropriate number of marine specialists).

We further propose that the new BC have:

- structural and cultural independence from DCLM;
- an external consultant to assist with the development of its strategic plan;
- internal reporting as to compliance with its strategic plan;
- sufficient resources for its expanded range of functions;
- the capacity to co-opt members for short terms or single meetings where they have experience relevant to a particular issue or region;
- members who are appointed for their expertise and experience, and in accordance with statutory criteria; and
- members who are appropriately paid, including a full-time chair who is not an employee of DCLM (and preferably, who never was).

In the transition to the above structure, or if our proposal to create a BC is not accepted, it is critical that:

- the resources of both the MPRA and the CC are substantially increased;
- consideration be given to the idea of staff who work for both bodies simultaneously;
- the level of independence of the MPRA is substantially increased;
- the requirement for concurrence of the Ministers is removed; and
- the MPRA and CC are required to hold regular joint meetings to allow for greater integration between their functions.

**5. *Report and make recommendations on any additional terms of reference added by the Minister during the course of the review***

Although we do not necessarily take the view that the Minister should extend the terms of reference to include a review of the operations and effectiveness of the CC, we set out here our additional comments on that body.

While the CC is overly focused on forest issues at present, we appreciate that this is happening because of the need to implement the Government's (largely laudable) forest policy. We look forward to the broadening of the CC's role to consider other matters, such as arid lands management and progressing the concept of joint management of the conservation estate with conservation groups and / or indigenous groups.

It should be noted that the effectiveness of the CC has increased markedly since the appointment of Dr John Bailey as Chair. As noted above, however, the operations and effectiveness of the CC have still been hampered by a lack of resources, lack of support staff, lack of independence from DCLM and unduly long time taken to fill vacancies both on the CC and within staff.

If our proposal for a BC is not accepted, or in the transition to a BC, we recommend that the CC have:

- structural and cultural independence from DCLM;
- sufficient resources for its current functions (we urge the Government to adopt, as a minimum, the staffing levels proposed when the CC was created);
- the capacity to co-opt members for short terms or single meetings where they have experience relevant to a particular issue or region;
- members who are appropriately paid;
- regular joint meetings with the MPRA to allow for greater integration between their functions.

It should also be noted that if our proposal for a BC is not accepted, we submit that the CC should audit the performance of DCLM with respect to the proposed Biodiversity Conservation Act.

\* \* \* \* \*

If you have any questions about this submission, please contact our Biodiversity Officer, Cameron Poustie, on 9420 7270.

Yours faithfully

Rachel Siewert  
Co-ordinator

# ***RECOLLECTIONS – SEMINAR ON THE DRAFT S.S.S.***

***16 OCTOBER 2002***

*Cameron Poustie, Biodiversity Officer  
Conservation Council of WA*

## **Broader issues raised in the context of discussion on the proposed actions**

Biodiversity is an overarching sustainability issue, and including the discussion of biodiversity in the 'Contributing to Global Sustainability' chapter is arguably simplistic.

Biodiversity should be considered in some depth in the 'Sustainable Use of Natural Resources' chapter, rather than simply being mentioned briefly on pages 96 and 105.

A broader point of relevance to the entire draft was the need to make more explicit the linkages between interrelated topics in general.

It should be noted that some participants felt that the environment was the dominant factor in the sustainability equation, but that a number of other participants strongly contested this view.

There was also some disagreement about the overall 'tone' of the draft. Some participants felt that the document was overly focused on Government requirements and did not sufficiently consider an incentive-based approach. Others had almost the opposite opinion – that the draft contained 'too many carrots and not enough sticks'.

## **Issues not currently dealt with in the draft SSS**

A number of participants felt that the strategy should make mention of the special significance of the Perth Hills – culturally, as well as in terms of water quality and biodiversity conservation.

An extension of the above point was that the strategy did not seem to address the importance of Perth's biodiversity in the 'Sustainability and settlements' section.

It was also considered that the conflicts of interest between, for example, the functions of conservation and land management held by CALM were not yet fully addressed.

## **Proposed action 2.6 – Global biodiversity commitments / long-term monitoring**

It was suggested that the science of biodiversity conservation presents an opportunity for WA. The State should provide significant funds for surveying biodiversity and monitoring human impacts, and this could be a lucrative 'service export industry' to the international scientific community.

The group requested that indicators for evaluating biodiversity conservation measures be developed, having regard to any international indicators (or processes for developing them) that may exist.

It was suggested that a proposed action referring to WA's international obligations should note the importance of addressing climate change to in order to protect biodiversity in the long term.

The group also asked whether this proposed action could be extended to dealing with the ways WA consumers, including the Government, could minimise their impact on global biodiversity loss.

Could the State ban the importation of non-plantation based furniture and / or give overseas aid to assist the Majority World in creating and defending more old-growth reserves etc?

It was also suggested that the State actively support the international treaty on addressing desertification, which the Federal Government has yet to ratify.

### **Proposed action 2.7 – Biodiversity Conservation Act and Strategy**

Michael Bennett (Department of the Premier and Cabinet) outlined the upcoming consultation process around a Biodiversity Conservation Act (to replace the Wildlife Conservation Act). A discussion paper is expected to go to Cabinet soon.

Discussion around mechanisms for better threatened species protection highlighted such possibilities as placing a financial value on such species, or imposing total bans on taking after the population gets to a certain level of crisis.

It was noted, however, that the BCA should not be limited to threatened species.

It was also pointed out that a key missing ingredient thus far has been political will, not strategic thought. The draft new Wildlife Conservation Act (and associated draft strategy) from 1992 were quite good in many respects and they simply ‘fell in a hole’.

There was some support for a BCA to allow Government’s to revisit ‘bad’ planning decisions from the past, such as land zonings, that are currently putting pressure on biodiversity.

It was agreed that a Biodiversity Strategy should:

- revisit the Conservation through Reserves Committee;
- address the publicly and privately held conservation estate;
- allow for regional ‘sub-strategies’; and
- prioritise conservation acquisitions and private incentive programs on the basis of the areas we want to directly protect and the corridors we will need to allow fauna to travel to and from them.

### **Proposed action 2.8 – Ningaloo as a World Heritage Area**

The group queried why Ningaloo was singled out as a proposed action. What further actions will take place to improve the management of the existing WHA at Shark Bay? What does the Government propose to do as Purnululu makes the transition? What process was used to pick Ningaloo out as the next nomination? If no such process exists, what does the Government suggest as a process to develop future nominations? In what timeframe would such a process operate?

Regarding Ningaloo, it was suggested that the Government ‘have the courage’ to oppose the proposed development at Maud’s Landing outright before the EPA process concludes. It was noted that the prospect of access to Barrow Island for access to the Gorgon gas field has been supported well in advance of an EPA process even beginning.

It was also noted that other, lower categories of protection were available for potential future nominations, and that such measures should be implemented as soon as possible.

### **Proposed action 2.9 – Nature-based recreation and tourism**

While it was agreed that biodiversity presents many economic opportunities, there were many concerns that areas of the State have been ‘opened up’ to tourism before adequate strategies and management techniques were in place. It was pointed out that a number of areas may not suit any human access at all (other than for scientific purposes).

Those areas where the risks can be managed should be subject to management plans, monitoring, and the regular review of their management plans.

It was suggested that ‘eco-tour’ operators be licensed and subject to codes of conduct.

The group also preferred to support passive, genuine, nature-based recreation rather than golf courses, marinas and the like.

It was queried why this proposed action does not mention a role for Indigenous peoples in managing the relevant areas.

It was also noted that, to the extent that tourism relies on interstate and international travel (particularly by plane), its inclusion as an aspect of sustainability must be queried.

### **Proposed action 2.10 – Biodiversity Research Consortium**

It was suggested that the Perth Zoo and all Perth Universities be included in the proposed consortium. The EPA was also raised as a possible partner.

Noting the inclusion of a Global Centre for Sustainability in the draft SSS, the group requested a diagram or flowchart that illustrated the relationship (if any) between all of the new organisations and partnerships suggested in the draft.

The group also wondered:

- how the research would be brought together;
- how the consortium would be funded;
- whether or not, and to what extent, the activities of the consortium would be commercial in nature; and
- what particular ‘synergies’ were hoped for.

### **Proposed action 2.11 – Biosphere West Project**

It was suggested that the Project link with field trips to the locations from which the ‘sample biodiversity’ was sourced. A related suggestion was that the Project provide people with contact details for local tourism operators and conservation groups currently working with and supporting the relevant ecosystems.

The group also felt that the Project should provide information on activities that support biodiversity, namely converting to native gardens and moving toward sustainable living generally.

It was also recommended that the Project play a role in educating, among others, local governments and landscape architects.

### **Proposed action 2.12 – State Bioprospecting Policy**

The group was concerned that this issue has already been the subject of a number of decisions (e.g. licences from CALM) in the absence of the much-needed Policy.

The Policy should address:

- how to protect Indigenous knowledge from exploitation;
- whether currently patentable substances should be recognised as being owned by Indigenous groups, or made subject to licensing without ownership rights;
- how any usable components of WA biodiversity would be sustainably ‘farmed’;
- how to protect native species from damage after synthetic usable components have been ‘created’; and
- the interrelationship with Genetically Modified Organisms.

### **Proposed action 2.13 – Biological Survey of Western Australia**

As a general point, participants felt that this proposed action warranted more information on what has been done on the Survey to date and what is proposed in order to complete it.

It was suggested that a lot of information relevant to this Survey already exists within mining companies and bioprospectors. How does the scientific community and the public generally get access to this data without inappropriately affecting commercial interests?

It was also noted that the role of Indigenous peoples in the Survey should be explicitly recognised in the proposed action.

### **Proposed action 2.14 – Marine pest incursions**

It was suggested that this point be broadened to deal with pests and threats to biodiversity generally, including terrestrial pests and soil diseases. Why was no mention made of the State Weed Plan?

### **Additional notes**

The ‘Indicators and targets’ section on page 84 suggests that the management of the forest and woodland estate by the Conservation Commission is currently ecologically sustainable. This is refuted by the conservation movement.

# ***RECOLLECTIONS – SEMINAR ON THE DRAFT S.S.S.***

***6 NOVEMBER 2002***

*Cameron Poustie, Biodiversity Officer  
Conservation Council of WA*

## **Attendance**

Bryan Jenkins, Tom Hatton and a few others.

## **Broader issues raised in the context of discussion on the proposed actions**

Biodiversity is an overarching sustainability issue.

## **Proposed action 1.25 – Global Centre for Sustainability**

BJ explained that the priorities of this partnership would be set by an Advisory Council. The group suggested that the Council would need to involve the Office of Science and Innovation and at least one permanent community representative. BJ suggested that this role may be taken on by the WA Collaboration, and that other community groups may be brought in for assistance with particular issues.

The group agreed that the Council should have members with good multi-disciplinary skills.

It was suggested by the group that the Centre should focus on issues of relevance to WA in particular, but that in many cases such research would have worldwide relevance.

The group queried how the Centre would be funded. BJ said that this was not yet resolved, but the WA Futures Fund was a possibility. It was suggested that research priorities should be strictly independent of funding sources – BJ said that was the intention and the reason the Council was to be separate to the board who would manage the Centre.

## **Proposed action 1.26 – Continue to support bids for Commonwealth funding**

The group queried why this proposed action did not also commit the State Government to an increase in funding for research. The group was aware that the State funded some projects, but it was seen as an inadequate to effectively only support sustainability-related research with ‘someone else’s money’.

It was noted that such funding should also be backed up with R&D levies (to raise funds for extending research programs even further) and appropriate regulatory measures.

## **Proposed action 1.27 – Determine research priorities and partnerships**

The group wondered how these research priorities would relate, if at all, to the State Sustainability Strategy when it was finalised. It was suggested that, as a minimum, the research priorities should be based upon the principles in the SSS. It was further suggested that ‘the next level’ of prioritisation should come from the process for developing regional strategies in the draft SSS, or some improved version of that process.



It was suggested that the final strategy should provide some information about where research funding is going at the moment, in order to provide the context for where the funding may be directed in future.

**Proposed action 1.28 – Healthy Country**

It was agreed that the State Government should be an active partner in this program, and not merely ‘endorse’ it.

It was also suggested that the final SSS address the intended relationship between the Centre (proposed action 1.25) and the Healthy Country program.

# ***RECOLLECTIONS – SEMINAR ON THE DRAFT S.S.S.***

***20 NOVEMBER 2002***

*Cameron Poustie, Biodiversity Officer  
Conservation Council of WA*

## **Attendance**

Academics, environmentalists, Dept of Industry and Technology...

## **Broader issues raised in the context of discussion on the proposed actions**

There was considerable concern that the draft strategy would be used to ‘greenwash’ existing Government initiatives. The proposed actions seemed largely consistent with what WA has been doing for some time – the focus of the proposed actions should instead be the things we need to do that are truly new and innovative.

It was also considered that the actions were at a fairly high level of generality. It would be useful to move to a new level of detail, for example “no marina at Maud’s Landing” and / or “only low impact accommodation in National Parks”.

It was noted that a draft sustainability strategy should deal with three types of issues:

1. what new things should we do?
2. what governance structures need to change?
3. what things we currently do must be reduced or stopped?

This draft strategy focuses heavily on 1, looks at 2 to some extent, and spends very little time addressing 3. The draft also needs considerable work on real, quantifiable sustainability indicators.

The group suggested that co-ordination of sustainability-related issues in WA was a huge job which justified a new agency. A ‘Ministry of Sustainability’ was mooted.

It was also recommended that the draft strategy be distributed widely, e.g. through public libraries.

## **Proposed action 3.32 – Nature-based recreation and tourism**

The group agreed that nature-based recreation and tourism does not necessarily equate with sustainable tourism. Potentially a bigger issue is how to ‘green’ tourism of all types – events, hotels, airports etc. It was considered that all tourism should be “subtle, low impact, more natural and cultural” as set out on page 115 of the draft.

There was considerable concern about the implication that international nature-based tourism was necessarily a sustainability-related ‘global opportunity’. The industry is completely reliant on cheap oil and a Federal Government that will not meaningfully commit to reducing greenhouse emissions; both of these parameters will eventually change.

It was suggested that a key part of sustainable nature-based tourism was the notion of carrying capacity. It is critical to recognise that some natural areas of WA can only support very limited human traffic – possibly only scientists, not tourists. Those areas that can handle higher levels of

human interaction should only be accessible to tourists after detailed management plans have been developed. Those plans should then be subject to monitoring and regular review.

In short, it was considered that maintaining the ecological integrity of a particular area was a sustainability “bottom line”.

The group noted that nature-based tourism need not be based solely around ‘natural’ environments – there may be opportunities for tourism associated with rehabilitation projects, eco-villages etc. A related point was that sustainable tourism is not just about environmental protection and economics, but it presented excellent educational opportunities as well.

The group also had concerns about the uncritical implication that the Bibbulmun Track was an example of sustainable nature-based tourism. When the current track was designed, very little effort was made to minimise new clearing of native vegetation.

### **Proposed actions 3.34 and 3.35 – Accreditation**

There was some concern about the way in which nature-based tourism was marketed. It was suggested that tourism operators be encouraged to market ‘experiences’ and ‘areas’ rather than particular ‘scenic views’ or icon fauna.

The limits of self-regulated accreditation were noted (conflicts of interest, a potential bias in favour of larger operators etc.) and it was suggested that self-regulation would often not provide adequate environmental protection. As a minimum, random Government ‘auditing’ of self-regulated operators was recommended.

It was agreed that accreditation should, in general, be proportionate to the sensitivity of the relevant environments. It was further noted that accreditation should have ‘levels’ – generic State standards and detailed local ones.

To that extent that nature-based tourism required CALM or other licences, it was suggested that appropriate accreditation should be a precondition to the grant of such licences.

Finally, it was noted that sustainability accreditation should incorporate relevant social factors, but that this was a relatively ‘uncharted’ area.

### **Proposed action 3.33 – Cultural tourism opportunities**

The group was keen to point out that cultural tourism necessarily changes the ‘culture’ being observed. It was therefore suggested that cultural tourism destinations, like nature-based tourism, needed to be considered in terms of ‘carrying capacity’. Similarly, some areas may be considered to be ‘no go’ from a local or Indigenous cultural perspective.

Some people in the group felt that certain types of tourism damaged local cultures – the Rally Australia was cited as an example.

The reference to Indigenous walking tours was considered a little flippant. The group noted that Indigenous people would be naturally inclined to develop tourist businesses if they did not feel like strangers in their own country. In other words, Indigenous tourism is best supported by addressing the root causes of Indigenous disadvantage.

# ***RECOLLECTIONS – SEMINAR ON THE DRAFT S.S.S.***

***4 DECEMBER 2002***

*Cameron Poustie, Biodiversity Officer  
Conservation Council of WA*

## **Attendance**

Environmentalists, ATSIC, Dept of Sport and Recreation...

## **Broader issues discussed (this constituted the vast majority of the session time, which was excellent!)**

Some members of the group felt that this chapter was the most deficient in the draft – the importance of social aspects of sustainability are acknowledged in the introduction to the chapter, but the issues are poorly or inadequately handled.

It was agreed that this section focused only on one aspect of health – the absence of disease. The group also noted that there was an important distinction (and interrelationship) between individual and community health.

It was emphasised that the improvements in health lauded on page 175 have not been experienced by Indigenous Australians. It was noted that, for those peoples, social exclusion has been a major factor in this regard.

The group noted that many other aspects of the sustainability agenda related to health in reasonably significant ways. It was suggested that links between related aspects of the draft and related proposed actions need to be significantly improved. Areas covered by the draft elsewhere that closely relate to human health include settlement design and biodiversity.

One area that the draft largely ignores, but which also can be linked to health, is the impact of social pressures to consume, in particular in the way conspicuous consumers are lauded in the popular media. Why doesn't the draft encourage people to buy less things and concentrate their expenditure on improving their quality of life more directly? Why doesn't the draft acknowledge the need for a state wide policy on consumption of goods, particularly those made from non-renewable resources? Simple measures at a community level, such as the collective ownership of lawnmowers for example, can significantly reduce such unnecessary consumption.

Also related to expectations and the popular media was the over-reporting of violent crime. The community fears this reporting has led to is a health consequence in itself, but those fears also lead to less walking around neighbourhoods and thus less physical activity in general.

The draft was variously described as too large and too 'top down'. Regarding the latter point, the group agreed that the focus should be less on producing a supposedly comprehensive list of things to do to advance sustainability and more on how to change governance structures and community attitudes so the agenda develops its own momentum. Along these lines it was suggested that the strategy be split into Government actions and stories to motivate the broader community.

#### **Proposed action 5.11 – Environmental hazards and ecological health**

The group felt this proposed action was not very useful as it refers to the status quo and is in very general terms.

#### **Proposed actions 5.12 – Regional Integrated Community Service Plans**

The group did not specifically comment on this proposed action.

#### **Proposed action 5.13 – Cultural dimensions in health programs**

The group felt this proposed action was not very useful as it refers to the status quo and is in very general terms.

#### **Proposed action 5.14 – Whole-of-government approach**

The group noted that this proposed action was no more than an objective, and wondered how this whole-of-government approach was to be implemented.

#### **Proposed action 5.15 – Health impact assessment**

Subject to the general limitations of this section of the draft, the group supported this particular proposed action.

#### **Proposed action 5.16 – Long term planning**

The group did not specifically comment on this proposed action.

#### **Proposed action 5.17 – Services to 0-8 year olds**

The group queried the focus on this specific age group, particularly as there was no mention made of such issues in the body of the section. There were also questions about the difference (if any) between this proposed action and the reference to this age group in the 'Actions underway' section.

## **Draft State Sustainability Strategy**

### **Comment on Sustainability and Settlements Chapter**

#### **Managing Urban and Regional Growth**

The opening paragraph and the first paragraph after the quotes uses the term “growth” and then talks about redefining growth in some places/instances.

*“Sustainability promotes growth (economic and social) in some areas where there is distinct poverty, for example in developing countries, and redefines growth for much of the developed world, which uses significant resources.”*

A clear definition of the term “growth” is required. In this section it is used in several different contexts, referring to economic growth, employment growth and physical growth. However, there is no redefining of the term as is suggested in the paragraph above. A discussion of progress and sustainable development as opposed to growth would be appropriate here. Certainly what is meant by redefining growth should be explained.

We would like the strategy to more fully address the continuing expansion of the Perth metropolitan area, we do not believe that this is sustainable and believe the strategy should address the concept of urban growth boundaries. It is time that we set expansion limits on Perth. It should also be noted that as far as we can understand the Future Perth process has stalled.

The Vision in this section refers only to areas that are in “decline”. It is important that areas that do not currently fit this category are also addressed in the vision, to ensure that they don’t begin to slip into “decline”. It cannot be assumed that areas that are not currently in “decline” are managing urban and regional growth in a sustainable manner, especially if we are redefining the term “growth”.

It would also be good to see an evaluation of what the key issues leading to decline are. These need to be addressed by the actions for this section. The actions listed at the moment are disjointed and do not clearly work together at a strategic level.

#### **Revitalising Declining Centres and Suburbs**

A definition of a declining centre/suburb would be useful. The Vision statement should be more positive, stating that *“A set of techniques are developed and **implemented** with community support...”*

#### **Integrating Land Use and Balanced Transport**

Again, the language should be more positive in some areas. For example:

*“4.13 **Require** all government and significant residential development...”*

Action 4.15: Bicycle Path Maps should be published and sold/provided broadly throughout the community. Maps such as this would encourage more people to cycle and would also reveal gaps in the network that should be addressed. In addition, this action refers to encouraging children to cycle and walk to school more. This should be extended to encourage adults to cycle and walk to work etc.

Action 4.16: Provision of safe and economical parking facilities at stations should also be a priority.

## **Managing Freight and Regional Transport**

A general comment is that the introduction/pursuit of sustainable consumption and dematerialisation could significantly reduce freight growth and should be considered as a means of reducing the need for freight movements. This is an area that is not dealt with at all well in strategy as a whole.

Nor, does this section really deal with the sustainability issue of freight movements – it is really focused on road planning issues. Moving freight to rail gets some trucks off the roads, a social benefit for some, but unless we have a rail network fuelled by renewable energy sources there are still enormous greenhouse impacts.

Shipping is another area that isn't really covered anywhere in the strategy, and this is probably the most appropriate place. The questions here are with regards to protecting our biodiversity from introduced species/pests, and the potential for oil spills along our coastline. The recent spill near Spain is yet another example of how lax worldwide laws on the types of ships used in this industry are. WA should be reviewing requirements here and trying to ensure that we never have an environmental, social and economic disaster like that currently being experienced on Spain's north coast.

Action 4.27: Does “more efficient use of trucks...” include backfilling?

Action 4.28: From the description given the Freight Network Review principles and concepts may be applicable to issues other than freight. Has extension of their use to other issues been considered?

Action 4.30: How will the expansion of the freight rail network be encouraged? Are there currently pricing signals or other economic incentives and benefits from using rail?

Indicators and Targets: “*Reduction of truck movements per unit of cargo moved.*” Shouldn't we be trying to minimise or reverse the growth in freight movements in absolute terms as well? Improving the efficiency is not effective if growth is at a higher rate than the efficiency improvements.

The indicators and targets do not address the objectives, so are meaningless in informing our progress toward the objectives.

## **Preserving Air Quality**

“*Monitoring should ensure industry emissions continue to improve.*” It is unclear how monitoring will ensure this. Monitoring is only a tool to inform progress, and needs to be a part of an overall strategy to enable industry to reduce its emissions.

“*The goal for Perth should be to ensure that the city's air is as clean as any other city in the world of comparable size.*” This is an opportunity for the WA Government to be showing leadership. Surely, we can aim for cleaner air than anywhere else? Also, how are we defining size? By population or land area? More highly populated cities tend to have higher air pollution levels, but are we happy to accept that as Perth's population gets larger our pollution will get worse. The question here is again one of per capita versus absolute/total impacts. Even if we improve air emissions on a per capita basis, if the population increase outweighs the improvements we will still experience worse air quality.

In the paragraph talking about the economic implications of addressing pollutants the implication is that if health and property costs aren't considered there is a net cost to the community. However, if

a Cleaner Production approach is taken, addressing air pollution may prove to have significant direct economic benefits.

Action 4.37: To resolve any air quality and greenhouse conflicts, the Greenhouse Task Force should be working closely with the Air Quality Management Committee.

The indicators and targets section doesn't actually set out what the targets are.

### **Reducing and Managing Waste**

A general comment arising from the strategy as a whole is that we seem to be using different strategies for each different issue facing government, eg life cycle analysis for waste management, the Freight Network Review etc. This raises a question over whether we should be using the same tools and approaches in decision making for the different issues to ensure we are using a consistent approach. It may well be that a range of "sustainability tools" are required, but it is important that the government think about this issue and refine the systems it wants to put in place.

The requirement for extended producer responsibility is a very good idea, but how effective would it be if it is solely WA based? A national approach would be far more beneficial in terms of making the scheme more economic and also in gaining the co-operation of the business community.

The Vision is not acceptable. It implies that waste is okay so long as it can be used as a resource – even if it is simply an energy resource. The Vision needs to promote the waste management hierarchy, so focus must be on the reduction/elimination of waste in the first place. We need to be very careful about locking ourselves into needing a certain level of waste production eg to run electricity plants.

Action 4.45: "***Mandate the use of recycled products...***"

Action 4.48: A "Waste Smart Government" program similar to the Energy Smart Government Program could be set up. This would mandate targets and annual reporting across all departments and would reduce the reliance on formal audits (which have been proven to often be ineffective in spurring real action in the past)

Action 4.50: "*Importing of hazardous waste from interstate or overseas will be prohibited.*" This is a nice sentiment, but what about exporting of hazardous waste? Don't we currently send hazardous waste to Victoria for processing? If we won't import waste, we need to take responsibility for our own waste and should commit to not exporting it interstate or overseas.

Again, the indicators and targets don't relate well to the stated objectives.

### **Sustainable Energy**

An alternative, and more ambitious vision could be that "WA has made the transition to a sustainable energy based community and economy within 50 years.

The second objective is really just a strategy for achieving the first objective. It is not clear how the first objective actually delivers the vision (or at least the globally innovative and locally responsible parts of it)

This section is by no means comprehensive, overlooking a lot of the activity that is happening in this area, particularly actions by local government and community groups.



Actions underway:

1. What is meant by “sustainable electricity generation”? While transitioning to gas has some marginal greenhouse benefits it cannot be classified as sustainable.
3. The whole SSS contains many statements like this that are not backed up with proof. In particular, this is a broad statement which is not currently backed up by any evidence of progress to date. This may be the intention of SEDO, but I think the SSS should be careful about overstating achievements unless it has some evidence of them.

#### **Strategies for Sustainability 4.59**

*‘Develop further voluntary schemes with the housing industry...’*

#### **Strategies for Sustainability 4.60**

*‘Develop a ratings scheme for all home renovations that provides incentives...’*

**Comments:** Voluntary schemes with the housing industry will not work.

Strategies 4.59 & 4.60 need updating to reflect the compulsory 4 Star BCA rating, which will be in force by mid-2003. Consideration needs to be given to extending requirements to apartment buildings and renovations, and progressively increasing minimum standards to 5 Star and beyond.

The building development approval process needs to be strengthened to prevent the construction of buildings that are not compliant with best practice energy efficiency and solar passive design. Decision-making authorities, such as local governments and the WA Planning Commission must be legally bound to refuse the development of buildings that are in any way energy inefficient.

All housing in Western Australia must be given a greenhouse rating. This rating must be presented whenever a building is to be sold. This would give property buyers necessary information upon which they could base their property purchase decision. The greenhouse rating system of housing would have a strong community awareness value.

#### **Strategies for Sustainability 4.61**

*‘Ensure town planning schemes require solar orientation of new developments to achieve 80% orientated houses...’*

**Comments:** This is an excellent recommendation, however it needs to be accompanied by extra detail, and examples of cases where the 80% target has been approached.

#### **Strategies for Sustainability 4.62**

*‘Encourage building design and management for energy efficiency for all Government buildings.’*

**Comments:** Change wording from ‘Encourage’ to ‘Require’.

#### **Strategies for Sustainability 4.63**

*‘Provide Eco-Loans as part of the existing Key Start program...’*

**Comments:** Eco-Loans should encompass the installation of Solar Hot Water Heaters on roofs.

#### **Strategies for Sustainability 4.64**

*‘Demonstrate government leadership in sustainable energy through Sustainability Action Plans.’*

**Comments:** State Government can show leadership in greenhouse gas emissions reductions through its own actions. Indeed such programs as the Sustainable Energy Development Office (SEDO) administered initiative that seeks to make Western Australian Government agencies implement targets to reduce their energy consumption, and reduce greenhouse gas emissions by up to 54,000 tonnes a year within five years, are commendable. It is essential that Government Agencies lead the way in this area.

*It is noted that the WA Government has committed \$16 million through SEDO to offer interest-free loans to agencies wanting to fund energy conservation initiatives. It is pleasing that the Deputy Premier and Minister for Energy is of the view that this initiative will stimulate jobs and support local sustainable energy industries. There is ample evidence that renewable energy technology, energy management and energy conservation opportunities abound. These sectors are growing as exciting providers of sustainable employment opportunities.*

#### **Strategies for Sustainability 4.66**

*'Develop a State BioEnergy Policy.'*

**Comments:** Ensure that any policy developed provides clear guidelines as how proponents of renewable energy systems should engage in public consultation. Guidelines should also discuss how the project approval process and planning issues should be dealt with. An overarching renewable energy policy needs to be developed.

#### **Strategies for Sustainability 4.67**

*'Develop new initiatives to manage peak load demand.'*

**Comments:** This can be addressed by installing smart meters/timers. All new and replacement meters should be smart metres. In addition, make people aware of how much energy they are using. Make energy use visual by locating meters or indicators in prominent positions.

#### **Strategies for Sustainability 4.68**

*'Promote mechanisms in the electricity market structure for encouraging renewable energy etc...'*

**Comments:** This should be reworded to read '**Develop** and **implement** mechanisms in the electricity market structure for encouraging renewable energy etc...'

#### **Strategies for Sustainability 4.69**

*'In meeting MRET investigate the scope for mechanisms to ensure that RECs are sourced locally.'*

**Comments:** WA is required, under the Federal Government's MRET legislation, to develop some 250MW of renewable energy by the year 2010 - if WA does not construct this capacity it will be built on the eastern seaboard and WA tax payers will foot the bill (to the tune of some \$650M). This further supports the need for a workable renewable energy access regime.

## **Institutional Arrangements for Sustainable Marine Management**

We believe that improved institutional arrangements are urgently needed for marine conservation in Western Australia.

The attached flowchart is a graphic representation of the bodies and relationship we see as essential.

As stated elsewhere in our submission we believe that a Biodiversity Commission should be formed that combines the functions of the Conservation Commission and the Marine Parks and Reserves Authority and is also given responsibility for the Biodiversity Conservation Act. The Biodiversity Commission would then provide advice on biodiversity and ecosystem related issues to the proposed Sustainability Commission.

The Biodiversity Commission would be responsible for:

- Auditing management plans (CALM estate) and operations of the Department of Conservation and Land Management;
- setting regional biodiversity objectives and performance measures for regional terrestrial and marine natural resource management plans,
- would accredit and audit these plans with respect to biodiversity objectives and
- oversee the creation of new reserves.

The regional marine plans would be developed by the regional natural resource management groups such as the Northern Agricultural Catchment Council.

The Sustainability Commission would set ecological and socio-economic objectives for the plans and audit agencies such as Fisheries and Transport against sustainability criteria for the marine environment.

Performance measures (indicators and their associated targets) for on the ground/water aspects of ecosystems (the actual operational aspects) would be set within the NRM plan, and it is these that the agencies (fisheries, tourism etc) must comply with, and be audited against. This would include a functional system of MPAs, and in essence is the basis of having the agency activities be, and be demonstrated to be, sustainable in the way in which we mean this term.

