

Enquires: Mr Phil Swain  
Our Reference: M03/1378 : EVM/002-02

26 February 2003

Professor Peter Newman  
Sustainability Policy Unit  
Department of the Premier and Cabinet  
15<sup>th</sup> Floor, Governor Stirling Tower  
197 St Georges Terrace  
PERTH WA 6000

Dear Professor Newman

**SUSTAINBLE NEDLANDS COMMITTEE COMMENTS  
STATE SUSTAINABILITY STRATEGY**

Please find attached a compilation of comments in relation to the State Sustainability Strategy document circulated late last year for comments.

The comments have been prepared by the City of Nedlands' Sustainable Nedlands Committee. Sustainable Nedlands is a Committee of Council composed of one Councillor and volunteers with expertise in the one or more of the areas of environment, heritage, business, economic activity, society, government or community. Please accept my apologies for the delay in response, which has been due to the limited number of meetings of the group over the Christmas/New Year period.

Please also be aware that the comments are not necessarily those of the City of Nedlands but rather, constructive input to the comment process.

Should you require clarification of any of the issues raised in the submission, please contact Mr Philip Swain, Manager of Health Services on 9273-3526.

Yours sincerely

Shayne Silcox  
CHIEF EXECUTIVE OFFICER

# The Western Australian State Sustainability Strategy – Draft Consultation Document

The comments and feedback presented in this report have been developed by the Sustainable Nedlands Committee: a group of residents who meet once a month to focus on locally relevant sustainable development issues in the City of Nedlands, and whom seek to provide a consultative community based input and feedback system into the local council decision-making processes.

This submission has been organised into two main parts. Part A will provide feedback in relation the consultation document on generic Sustainability issues, and on the overall conceptual framework and approach taken in the development of the strategy. Those comments tabled under Part B will relate more specifically to aspects of the strategic focus areas highlighted in the report, but we have not commented on all the focus areas.

## Part A

Issue of Concern	Sustainable Nedlands Committee Response
Failure to include stakeholder groups	The strategy fails to include a plan to incorporate commitment from a range of non-governmental stakeholder groups, such as businesses, without whose participation, ownership and commitment to the State Sustainability Strategy, a transition to a 'sustainable future' is unlikely to occur
Proposed amendments to the <i>Environmental Protection Act 1986</i>	The proposed introduction of the "Principals of Environmental Policy" into the Act, although based on the outcomes of the 1992 Rio de Janiero Conference on Environment and Development, and from the Australian 'Intergovernmental Agreement on the Environment', are not the same as the principles outlined in the Sustainability Strategy. This in effect means that the EPA will have to regard the 'Principle of Environmental Policy' and not those of Sustainability when assessing development proposals.
Development of a Sustainability Unit	Neither the current <i>Environmental Protection Act</i> nor the amendments provide for a Sustainability unit to be established within the EPA. If it is the governments intention to set up the unit in the Department of Environmental Protection, the Strategy should say so.
Sustainability units	It seems odd that the Government is going to establish only 3 Sustainability Units ignoring the largest resource agency – The Department of Mineral and Petroleum Resources (ie: new Department of Industry and Resources). It is understood that the Department both plans and participates in resource development and, regulates much of it once proposals are implemented. What steps are to be introduced to establish "Sustainability assessment" within that Department?
The timing of production of the States Sustainability Strategy when compared to the Greenhouse Strategy	In relation to development it seems inconsistent that the State's Sustainability Strategy is brought forward in advance of the Western Australian Greenhouse Strategy. The indication is that greenhouse gas emitting development proposals will continue to be approved in Western Australia without the benefit of a gas limitation strategy
Human Health	Health considerations in relation to development proposals have recently been of concern both because of increasing incidence of contaminated sites being identified, and because of perceived toxic emissions from industry. The government has include sustainable transport, permaculture, household composting

Product labelling	A vehicle to introduce mandatory product labelling would help consumers assess products in terms of the amount of energy needed to manufacture items and the amount of energy needed to operate them. Without this type of tool it is very difficult for the average person to incorporate unseen environmental costs into their purchasing decisions
Revegetation	It is highly contradictory that millions are being spent on land and water management and reforestation when forestry practices are still unsustainable. The proportion of old growth forest still being cut (not withstanding the government commitment to reservation of old growth forest) is still substantial
Alternative Energy Sources	<p>There is no mention of alternative sources of power (biomass, wind, solar, nuclear). The report focuses on petroleum and LPG as a possible alternative, yet both of these fuel types are finite in terms of supply and produce greenhouse gases.</p> <p>Appropriate actions for this section should include research funding and subsidies into alternative energies, coupled with reductions of subsidies for cars and petroleum-using modes of transport.</p>
Wording	On page 91 the phrasing 'global opportunities' is unfortunate. Because we have a serious oil dependency problem, we now have a golden opportunity?

## Sustainability and community

Issue of Concern	Sustainable Nedlands Committee Response
	<p><b>Proposed Actions</b> p170,  5.2 <i>Facilitate local community involvement in defining community service needs thereby creating engagement with local issues and the inspiration and energy to solve them</i></p> <p>How does the government propose to do this? Funding for local government administrative liaison working groups would be good!</p>
	<p><b>Indicators</b> p170,  • <i>The number of Regional Integrated Community Services Plans completed.</i></p> <p>This is an indicator of a strategy, not an outcome. I would prefer to see an outcomes based indicator.</p>
Housing and Sustainability	<p>Introduction on p171 is all about the social aspects of housing. It needs to be linked to energy efficiency and sustainable government commitment to best practice in the section on Energy/Settlements</p> <ul style="list-style-type: none"> <li>- the government also needs to look at the planning approvals process and remove restriction and impediments to community settlements such as Pinikari.</li> </ul> <p>P172 <i>In addition, local governments often have land available on which community housing, demonstrating Sustainability principles, could be developed.</i></p> <p>(This here simply to note the potential role for local Govt.) indicated that there needs to be a closer tie between environmental and health assessment. The Sustainability Strategy appears to ignore this relationship. Human health issues require closer examination when development proposals are under consideration.</p>

## Part B

### Contributing to global Sustainability

Issue of Concern	Sustainable Nedlands Committee Response
<b>'Vision for western Australia'</b> Statement	<p>The <b>'Vision for western Australia'</b> statement (p.74), is misleading and is written as though Western Australia has an over-riding contribution to the solution of global Sustainability issues when it is more likely to be true that we have a greater influence in causing them.</p> <p>There are problems with the Vision for Western Australia statement as it is written. Firstly it alludes the reader into believing that the prime benefit of contributing to global Sustainability is through the job market, to the exclusion of many very valid non-economically based, more ethically centred intrinsic reasons (eg inter-generational equity). And secondly, the context and use of the words <i>global</i> and <i>local</i> suggest that these global –issues are external orr 'non-local' to Western Australia. Not indicative of the self-responsible proactive approach that is required for real and behavioural changes to occur, after all Western Australians have the greatest influence over the behaviour of other Western Australians.</p>
The <b>goal</b> statement	The <b>goal</b> statement (p74) begins with the words 'play our part' which suggests a reactive approach to global Sustainability solutions. It suggests that we will continue to be followers and not take initiative and be leaders in this field.
The approach	<p>The vision and goal statements suggest that the Western Australian strategy to global Sustainability issues will be reactive or even perhaps inactive</p> <p>The following subsections in this chapter tend to follow this relatively reactive approach to the development of the State Sustainability strategy, and so as they reinstate the current situation there is no point in commenting on them further.</p>
Corporate accountability	One glaring omission to this section has been the failure for the government to identify the need for Western Australian based companies to employ environmental Best Practice standards on their foreign investments. After all, according to Agenda 21, Global Sustainability issues where to be addressed by wealthier western nations transferring the appropriate technologies, knowledge and skills to such nations and increasing aid monies to them so they could then use newly acquired resources to implement sustainable development objectives. Yet since the Rio Summit, the amount of aid money going to developing nations has plummeted and foreign direct investment has skyrocketed rendering the people of these countries vulnerable to companies that may deliberately pollute in order to increase their profit margin (eg: the fly river in Ok Tedi). It seems that the number of firms with the appropriate environmental skills knowledge and technology causing environmental catastrophes in nations with limited or poor enforced environmental regulations is on the rise. The report does not address this issue.

Issue of Concern	Sustainable Nedlands Committee Response
Integrated educational plan	<p>Sustainability education could be included into the secondary school curriculum to educate our future decision makers about Sustainability issues (ie: topics may</p> <p><b>Objectives</b> p173</p> <ul style="list-style-type: none"><li>• <i>Ensure that this housing provides on-going Sustainability benefits.</i></li></ul> <p>This should be more specific about environmental outcomes linked with social one. An energy efficient house is preferable and healthier for low income families.</p>

Indicators and Targets	<p><i>Proportion and distribution of public housing, community housing and affordable private housing.</i></p> <p>Prefer to include the words “energy rated”.</p>
Sustaining healthy communities P175	<p>Largely related to state responsibilities.</p> <p><b>Objectives p178</b></p> <ul style="list-style-type: none"> <li>• <i>Create greater links between health and other elements of Sustainability.</i></li> <li>• <i>Reduce the incidence and severity of disease by increasing the focus of the health sector on primary and secondary prevention.</i></li> </ul> <p>Local government can have a role here in urban design to promote physical activity, siting of services – particularly those used by children daily such as schools. Recent (state) Govt policy of building larger schools spaced further apart has limited the amount of physical activity children can include as part of their daily routine.</p>
	<p>P162. Sustainable Planning, building and Construction Guide and/or the ‘Sustainable home living package’ to include information on other things as well, eg. Washing machines, cameras, etc. with the explanation, why they are sustainable. I have seen a book in Melbourne with this sort of information, but unfortunately didn’t buy it. The explanations could include financial incentives as well.</p> <p>Electronic format would be ideal for easy and regular updating. And it should be made easy to use by everyone, like if someone needs new floor coverings, they could just look up what would be the best, and second best etc. materials to use.</p>
	<p>It would be good for the Guide to have a list of architects, builders etc. who work with sustainable principles</p>
	<p>Re. Education and Community Awareness:</p> <p>I would put a lot more emphasis on adult education, after all, they are the ones who teach the children the role of parents is very important, not just the teachers.</p>