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**COMMENTS FROM THE CITY OF COCKBURN ON THE CONSULTATION DRAFT OF
"THE WESTERN AUSTRALIAN STATE SUSTAINABILITY STRATEGY"**

The City of Cockburn commends the Western Australian State Government on it's initiative in the preparation of such a strategy and it's commitment to the goal of sustainability.

General comments from the City of Cockburn Officers on the "The Western Australian State Sustainability Strategy" (the Strategy) are provided below:

- The trend in recent years to apply more 'fiscal restraint' in State Government spending has seen a reduction in extent and / or quality of services from many Departments. Implementation of many of these Proposed Actions will require additional up front funding to be effective and should not be at the cost of existing services. Actions will require a defined agency or body with responsibility for implementation to ensure that it occurs. The Government's commitment to sustainability will be judged by the actions that result from the Sustainability Strategy.
- Concern is expressed over the definition of sustainability given in the Strategy. "Sustainability is meeting the needs of current and future generations through simultaneous environmental, social and economic improvement". Simultaneous improvement in all three elements, while a visionary and commendable notion, would seem to be an unrealistic option in most circumstances. The main area of concern is that if a project is subject to a sustainability assessment and refined in light of this assessment, leading to an increased cost of implementation but with a better social and environmental outcome, is that project then no longer defined as 'sustainable' (i.e. reduced 'economic' outcome)? This could deter many organisations from undertaking the better outcome option if achieving 'sustainability' is considered out of reach.
- The need for integration between the three elements of social, economic and environmental gains is noted. However, it is believed the 'triple bottom line' decision-making process of considering all three elements equally with minimal trade offs (as stated as one of the process principles) will lead to a wider community acceptance and ultimately more sustainable outcomes in a shorter time frame, rather than requiring improvement in all three elements.

The following comments are provided from the City of Cockburn's perspective on the Strategy:

- The Strategy discusses Social, Economic and Environmental Assessment Units being developed within separate agencies as a transitional arrangement to initiate sustainability assessments. The process of assessment and the communication lines between these Units will need to be clear to ensure integration of ideas and the Units will need to be sufficiently resourced to undertake adequate assessments. The final decision maker in this process is also unclear and would need to be clearly established.
- The development of a sustainability assessment process should include genuine and thorough public and stakeholder consultation (appropriate to the scale of the proposal) and, where possible, integrate with existing processes to avoid duplication, process confusion and excessively lengthy Government approval processes.
- While the State – Local Government Roundtable on Sustainability is supported by the City of Cockburn, there is some concern about the level of Local Government representation on the Roundtable. It is envisaged that representation should include both elected Members and Council officers to assist with providing detail about the internal processes of Local Government to ensure any framework and implementation processes are consistent and complimentary with existing processes.
- In the “Protecting Aquatic Ecosystems” section, one of the proposed actions is to manage the water resources for their sustainable use and development. Who assesses the sustainable use level?
- This section also discusses assigning Environmental Quality Objectives to wetlands and embedding these objectives within Environmental Protection Policies (EPP). This is a useful management tool in some instances but does not recognise the high level of management many remaining wetlands (particularly in the City of Cockburn) are subject to. The ecological value of the wetlands and the current threats are well known, what is necessary is assistance to ameliorate the threats from such activities as urban drainage emptying directly into a wetland. Assistance is required where water treatment and / or changes to drainage design in established suburbs is necessary. Putting this responsibility solely on Local Government through EPPs would prove a significant financial burden.
- The Proposed Actions for “Education and Community Awareness for Sustainability” concentrate too narrowly on education initiatives in schools. Education on sustainability needs to be increased within the broader community. These initiatives should have been further developed in the Strategy rather than referral to a yet to be developed “comprehensive communications strategy”.
- “Sustainability Through Culture and the Arts” talks about the need for new capital infrastructure for arts, the lease of Government properties on peppercorn rates for artists’ studios, bringing arts to the community etc. It seems many of the objectives could be achieved by more innovative thinking in the use of existing Government infrastructure. For example, Government schools (the library, hall, gym etc) could be used to hang art work for display after school and / or on weekends with the local community encouraged to view and participate, encouraging the development of a sense of identity and fostering local artistic creativity.
- The “Financial Reform and Economic Instruments for Sustainability” section refers to the implementation of the triple bottom line for the State Government budget as being a long term goal. The State Government should be taking a lead role in the

introduction of Sustainability and require its agencies to be reporting triple bottom line performance in Annual Reports and budget expenditure assessed against sustainability criteria. This should be seen as a short to medium term goal with reviews and adjustment as required as the process develops.

I trust the above comments will assist in development of the final strategy and look forward to seeing the outcomes of the actions proposed in the strategy.

Ben Hollyock
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