

# **DEWCP Comments on the Consultation Draft of the State Sustainability Strategy**

## **Item 1**

The authors are commended for producing a detailed consultation draft document on a difficult subject, and for conducting 6 lengthy public workshops in Perth on the 6 key chapters of the document. As it presently stands, the document is more oriented towards the environmental concerns for sustainability; more needs to be presented on economic and social concerns, and the three areas of sustainability need to be better integrated in the document.

## **Item 2**

### **Readability & Review of the document/Sustainability definition & principles**

#### **2.1 Readability of the document**

The layout of the draft strategy does not lend itself to easy reading. The colour scheme, print size and headings do not assist clarity. There are major environmental issues that cut across the theme chapters (e.g. greenhouse gases and biodiversity), and new readers may find it difficult to follow the layout. There is no glossary of terms nor a comprehensive reference list.

The layout of the document contains:

- colour selection, variations in type faces and changing backgrounds that distract from the substance of the strategy (and that are difficult to print from an e-copy); and,
- box formats (same colour type on the same colour background) that make it difficult for the reader to digest the lengthy strategy.

In this regard, it would be useful to view the layout of the SOE Report 1998 if it is deemed necessary to produce a final strategy in colour. If a less colourful document were decided upon, reference to the layout of the Australian and New Zealand Water Quality Guidelines for Fresh and Marine waters would be useful.

#### **2.2 Sustainability definition & principles**

Interestingly, whilst the term ‘sustainability’ is mentioned early in the draft Strategy, it is hard to find the definition. Given that this term is integral to the Strategy, it is noted that it first appears on **p 24**. Hence, it is suggested that it instead be inserted in the Executive Summary near the start of the document (and be highlighted).

Also, a note that the Government will be working to phase out unsustainable practices, including within its own operations, should be inserted early in the Sustainability Strategy.

#### **2.3 Review of the document**

There should be a clearly stated process to develop this document through community and agency involvement. Because the document would get out of date after a few years, a review process also needs to be agreed upon and made public in the document (see bottom of **p 18**).

### Item 3

#### Overview table of roles and responsibilities

In August 2002 DEWCP submitted a table on what were believed to be important and relevant roles and responsibilities of Government, Business and the Community. This approach could be reviewed, to show major items to be addressed by the Sustainability Strategy, perhaps in an Executive Summary. The table is submitted again so that this approach can be considered and the table adjusted as appropriate.

**Table 1: Roles and Responsibilities for Sustainability.**

Sector	Roles and Responsibilities
Government	<ol style="list-style-type: none"> <li>1. Leadership, decision-making and good governance.</li> <li>2. Policy framework.</li> <li>3. Plan developed with the community.</li> <li>4. Provide for (independent) performance evaluation and public reporting.</li> <li>5. Providing incentives for sustainable practices</li> <li>6. Forge partnerships; take and respond to initiatives.</li> <li>7. Examples promoted of sustainability in practice</li> <li>8. Institutional reform, including appropriate revisions to legislation and regulatory practices following full community debate</li> <li>9. Capacity building within and outside government.</li> <li>10. Resourcing sufficient to support government actions.</li> </ol>
Business	<ol style="list-style-type: none"> <li>11. Embrace and pursue triple bottom line public reporting (noting that this in itself is not necessarily a measure of sustainability).</li> <li>12. Pursue the objectives of sustainable industry practice.</li> <li>13. Peak industry groups to pursue a leadership role in their business sector,</li> <li>14. Consider socially responsible investment</li> <li>15. Implement green offsets for sustainable development.</li> <li>16. Commit to sustainability as a proper part of doing business.</li> </ol>
Community	<ol style="list-style-type: none"> <li>17. Recognize and act on the need for behavioural change by all members of society as the key to long term success. Sustainability ultimately is about the aggregated influence and outcomes from millions of everyday decisions by everyday people in everyday lives.</li> <li>18. Pursue opportunities to play a role in community leadership to achieve sustainability.</li> <li>19. Contribute to and respond to good practice guidance.</li> <li>20. Consider “ethical investments.”</li> <li>21. Look for opportunities in volunteer, sustainability – based community activities.</li> </ol>

### Item 4

#### The Vision – Implementation – Performance Audit Feedback Loop

The Strategy needs to be clear about the inter-relationship between 3 key areas:

1. Development of a Vision, Environmental Values and Targets (through a community consultation process), which set the **desired outcomes** of the Strategy;

2. Implementation of an **Action Plan** that is sufficiently funded, shows timelines, and notes which agency(s) is responsible for which action; this also needs to be well-coordinated between Government agencies and between Government and the community; and,
3. Completion and publication of periodic **performance audits** on Action Plan/Targets (e.g. for environmental performance, the EPA can conduct NRM Audits and SOE reports), followed by adaptive management to refine procedures and improve performance (see also **Item 24** and **p 49** of Strategy on triple bottom line reporting).

A figure to show this inter-relationship would be helpful as well (or adjust **Figure 1** on **p 27**).

### **Item 5 Text, p 9**

*Commitment: Value and protect our environment and ensure the sustainable management of natural resources.*

#### **Comment**

The authors are to be commended for proposing this commitment. DEWCP will have a leading role in continuing to implement sustainable NRM.

### **Item 6 Text, p 9**

#### *Agency leadership*

*The government will demonstrate leadership by ensuring the way it governs is supporting sustainability through its policies, legislation, decision-making and programs. The sustainability of operations of agencies will be enhanced through Sustainability Action Plans. The government can also assist business and the community to embrace sustainability and the new opportunities that it presents*

#### **Comment**

This statement is fundamental to adopting the strategy. For all of the general statements of support made by peak bodies and individuals in this draft strategy, the commitment to the strategy will only be tested when there is either a downturn in the economy or a particular sector is required to address the accumulated debt of past generations.

It is in the interest of sustainable development and good governance that any apparent conflict of interest is resolved. The present review of the Water Services Co-ordination Act is focusing on these issues within the water industry as a whole (separating the roles of regulators, resources managers, policy development, auditing and reporting). This may be an appropriate time to focus on this review from a governance perspective, as this is an opportunity to remove any perceived conflict of interest and improve our relationship to national water programs, such as the to the COAG water reform agenda and the NWQMS.

### **Item 7 Text, p 9**

#### *Assessment*

*Sustainability assessment is an integrative, whole of government approach to decision-making that gives equal and up-front consideration to environment, social and economic factors. It is an innovative and important means of ensuring that government's activities are sustainable, and also extending this expectation to business and the community. Sustainability assessment goes further than mitigating the negative impacts of an activity by searching for opportunities to achieve simultaneous improvement in all three aspects of the triple bottom line. Sustainability assessment will be undertaken on significant...*

### **Comment**

Clearly DEWCP would support the above. Water resource management seeks to achieve this through the allocation planning process. It is noted that the *Environmental Protection Act 1986* defines the scope with respect to how much the EPA can comment on the three elements of the triple bottom line. However, the EPA would continue to report to Government on environmental and some social matters affecting or likely to affect the environment.

### **Item 8 Text, p 10**

#### ***Contributing to global sustainability***

##### ***Biodiversity***

*Western Australia's biodiversity is recognised as highly significant globally, and its conservation is a prerequisite for sustainability. In addition, biodiversity offers the potential for new forms of sustainable industries, such as bio-prospecting and nature-based tourism. The challenge for Western Australia is to better understand the biodiversity that we have and to ensure it is protected for future generations.*

### **Comment**

This statement is fully supported. Note that biodiversity conservation has a 'bottom line' beyond which compromise and/or offsets become irrelevant in the context of decisions on sustainability.

### **Item 9 Text, pp 12-13**

#### ***Sustainability and settlements***

*The way we plan, develop and redevelop our cities and towns greatly influences our resource use and the quality of life in our settlements. In urban areas the impacts of our lifestyle often becomes very apparent through pollution and waste. Clearly, there are many opportunities to create a more sustainable future through looking at the way we design and live in our settlements.*

##### ***Water***

*The sustainability of our water supply is an issue of concern to many Western Australians, especially those who live in the South West. There is a need to provide a vision for the future, new sources of supply and new ways to save water.*

## Comment

The population of WA is expanding in the Southwest in the same direction that the climate has been drying for the past 20 years (CSIRO quote). It is important that the issues of water resource management be addressed effectively. The new State Water Strategy and the State Water Conservation Strategy will provide direction in this regard, but greater effort is required by Government given the CSIRO forecast. DEWCP will continue to play a key role in developing and implementing sustainable water management strategies in WA.

## CHAPTER 1 Introduction

### Item 10      *Box 1: AN OVERVIEW TO . . . , p 16*

#### *Establish an ESD Unit to:*

- *develop a strategy for sustainability*
- *monitor and coordinate the environmental, social and economic assessments of government agencies*
- *undertake ESD assessment of Cabinet submissions, proposed legislation, and agreements*
- *work with agencies to prepare a code of conduct for policy making and management arrangements.*

*Introduce annual environmental performance reporting requirements for all government agencies in areas such as energy consumption, waste disposal, vehicle fuel efficiency and recycling.*

*Encourage all government agencies to buy recycled products where these are available at competitive prices.*

*Set an example by requiring government departments and agencies to set targets for waste reduction and recycling.*

*These will be audited according to the principles of ESD and included in all Annual Reports.  
Source: Environment Policy.*

## Comment

The statements in this Box are fully supported by DEWCP. For the Sustainability Unit to be effective it would need to have sufficient resources, particularly enough staff, and the empowerment of Cabinet; otherwise new initiatives that are difficult to address in a sustainable manner could wind up doing endless laps with Government agencies, but with ever diminishing results.

## CHAPTER 2 The Conceptual Basis

### Item 11      *Text, p 22*

*Ecologists around the world had been warning from the 1960's that the earth had reached certain limits:*

- *human-induced climate change seemed certain as the atmosphere had increased its CO<sub>2</sub> concentration by 28% and certain new chemicals (CFCs) were threatening the ozone layer*
- *deforestation and land degradation from overgrazing and over-cropping were spreading rapidly*
- *fresh water supplies and groundwater were being depleted and polluted*
- *human beings across the globe had toxic chemicals in their tissues*
- *the continued loss of species and threats to important ecosystems was everywhere apparent.*

*Scientific evidence on the problems was mounting and scientists began to speak out. Ecologists warned that population growth must stop and further economic growth must be prevented as it was driving problems like those listed above. At the same time those in developing countries, faced with continued poverty and deprivation, did not share the ecologists' viewpoint. For them development was essential: they needed food, clean water and shelter. The one billion people living in poverty had a strong case for economic development.*

### **Comment**

The above statement is very relevant to WA because of its rich biodiversity, particularly in the Southwest. DEWCP is active in biodiversity conservation, and has recently provided extensive comments on *A Biodiversity Conservation Act for Western Australia: Consultation Paper*, released recently by CALM.

### **Item 12      Text, p 22-23**

*The Brundtland Commission concluded that there ought to be development but it must now be different: it must be sustainable development. Development needed to be more directed to meeting the needs of the poor in a way that no longer causes environmental problems but helped to solve them. In other words development must meet the needs of current and future generations through simultaneous social, environmental and economic improvement of the human-ecological system. This would not happen quickly as the world's economy was built around short-term gains that did take into account these long-term issues*

### **BOX 2: THE GLOBAL NEED FOR SUSTAINABLE DEVELOPMENT: TIME TO RE-EXAMINE THE FUTURE**

*Emeritus Professor Ian Lowe is working with the Environmental Protection Authority to prepare a position paper, entitled *Towards Sustainability*, from the perspective of the Environmental Protection Authority. A section in the position paper will highlight global environmental issues:*

- *Nearly 50% of the earth's land surface has been transformed for human activity.*
- *More than half of the earth's accessible fresh water is now being used, directly or indirectly.*
- *More nitrogen is being fixed synthetically in fertilisers than naturally.*
- *More than half of all mangroves and coastal wetlands are lost.*
- *The rate of species extinction is between 1,000 and 10,000 times what it would be naturally.*
- *In the second half of the twentieth century the human population doubled but grain production trebled, energy use quadrupled and economic activity quintupled.*
- *Although the world economy has grown from US\$5 trillion over the last 50 years, the number of people who live on US\$1-2 a day is projected to increase from two to four billion within the next 25 years.*
- *Global oil production is nearing its peak with nine barrels consumed for each one discovered.*
- *The global atmosphere has increased in greenhouse gases by 28% over the past 130 years and has reached a point where noticeable and sustained climate change is now occurring.*
- *The global loss of land to salinity and other land degradation is around 12 million hectares per year, about the size of the Wheatbelt.*

## Comment

Given that WA's economy is largely a primary production economy, the above comments are most appropriate. The adoption of water conservation measures in WA will gradually clarify what is meant by 'sufficient' in terms of sustainability. The WA Government also needs to resolve governance issues related to water resource management to effectively address this issue (see Comment, **Item 9**).

## Item 13 Text, pp 23-24

*Western Australian Governments have considered sustainability over the past decade but the Labor Government was elected with a strong set of commitments to produce a sustainability strategy across the whole of government.*

*Box 3 demonstrates why Western Australian must pursue a sustainable future.*

### **BOX 3: THE WESTERN AUSTRALIAN SITUATION**

*Examples of Western Australia's significant environmental and social issues include:*

- *4.4 million hectares are affected by salinity or at risk of further salinisation and this could double over the next 50 years*
- *rainfall runoff in the South West of Western Australia has reduced by 50% over the past 25 years partly due to greenhouse induced climate change*
- *salinity and overgrazing threaten about one quarter of endangered plant species*
- *South West Western Australia ranks twelfth out of the world's 25 most significant biodiversity 'hotspots'*
- *Western Australians, consume a lot of resources especially water, land and transport energy*
- *health and social indicators reveal high levels of deprivation in Indigenous communities*
- *the population and economies of many rural communities and parts of Perth are in decline with consequent social and environmental problems.*

## Comment

Whilst this box certainly emphasises the urgency for these issues to be addressed, the urgency for freshwater quality issues in particular to be effectively addressed would become even more apparent if one were to also add sedimentation/turbidity, eutrophication, trace contamination and population growth pressures.

## Item 14 Text, p 29

### **Box 5: RESOURCE USE AND SUSTAINABILITY**

*In Australia, a similar situation applies with water use. In the past 10 to 15 years most Australian cities have reduced per capita water consumption, except Perth where this occurred in the previous decade. The consumption of water demonstrates that demand management has reduced the use of water at the same time as our economic health has improved.*

## Comment

It is generally acknowledged that over the past 25 years, due to declining precipitation and increasing development/population pressures, water resource management in WA, especially in the more populated Southwest, has become significant. The following are a list of matters that should be considered before the Strategy is finalised:

- environmental water allocations often have not enough scientific research to back them up until more recently in WA by resource management agencies. A course is now being run by the day-to-day water resource manager at one of the universities regarding ‘environmental water allocation/provisions’, showing this shift in emphasis;
- water quality across the board will likely continue to deteriorate in southwest WA for a number of years (due to secondary salinity, eutrophication, sedimentation and turbidity, etc), resulting in more pressure being placed on the remaining water that is of higher quality (SOE Report 1998);
- the drying climate in the Southwest of WA will continue to impact on the available quantity of water for human use and the environment (see IOCI report, 2002);
- the increasing population and agricultural/industrial demand for more water in WA has usually resulted in decreased environmental water flows. For example, each time a dam is built, water is diverted away from the downstream environment resulting in a loss of ecological habitat and a potential reduction in biodiversity. The combination of damming rivers and a drying climate is having a serious impact on the environment (Note: more attention needs to be given to the National Principles for the Provision of Water for Ecosystems 1996);
- the Ministerial Conditions placed on the managing agency for some water resources are not being met, resulting at times in the lowering of the groundwater table. In turn, this has at times resulted in the drying of riverbeds, wetlands and caves etc, with an accompanying reduction of aquatic habitat and a likely loss of biodiversity. This situation requires further investigation and remedial action;
- in some cases there is insufficient information to calculate water balances for many significant water resources, even though water allocations away from the environment are still at times being permitted (Note: there is a need to apply the precautionary principle); and,
- the licensing of water extractors across the State is incomplete. In some cases the data on how much water is available and how much is being extracted from the environment is also incomplete, with insufficient resources available to get enough data statewide (let alone in areas under pressure) in the short term. This will become more of an issue if and when NRM charges for water use are imposed – a portion of these fees will need to address this data issue. The need for water conservation practices, as tied to an appropriate fee regime for major water extractors, continues to be at issue statewide.

In summary, there is a major issue of ‘prioritising’ for the manager of water resources to address the aforementioned items, due to current budgetary constraints, and there are additional governance issues related to water to consider.

**Item 15      Text, p 30**

***SUSTAINABILITY VISIONS FOR WESTERN AUSTRALIA***

*The State Sustainability Strategy has suggested that these principles mean Western Australia needs a set of visions for governance, global contributions, natural resources, settlements, community and business. By establishing these visions the sustainability principles begin to become more practical.*

**Comment**

DEWCP fully supports the above statement. The EPA, as assisted by DEWCP, can also help the Government to determine the environmental values and objectives through a community consultation process (Note: this is already being done for EPPs).

**Item 16      Text, p 30-31**

*Vision and Goals as noted in white print on a dark blue background*

**Comment**

DEWCP supports all of these visions and goals. It should be noted that, when it comes to freshwater resources, a proper and independent performance audit is urgently required, using a set of sustainability indicators related to water.

**Item 17      Text, p 35**

*Government should be giving leadership. It should be constantly raising the profile of sustainability, announcing a vision for the future. All government departments should be taking the lead to improve their economic, social and environmental performance in a demonstrable manner i.e. Government should be actually “walking the talk” in sustainable practices, sooner rather than later. Australian Corporate Citizenship Alliance, Western Australia.*

**Comment**

This statement is supported.

## **CHAPTER 3 Sustainability and Governance**

**Item 18      Text, p 36**

***SUSTAINABILITY ASSESSMENT***

*Sustainability assessment is a new process that provides integrated advice to provide net benefit outcomes. The government will build on environmental impacts assessment to develop sustainability assessment of projects, plans, policies and programs as well as legislation, Cabinet submissions, corporate plans and proposed government agreements.*

*Sustainability-based environmental assessment is certainly different from the more common, narrower exercises that typically consider only some aspects of environment and focus chiefly on negative effects. It is more ambitious, more demanding and much more positive. But it is also, in important ways, not a huge step from present practice and present capabilities.*

**Comment**

The establishment of a ‘sustainability assessment’ process is supported by DEWCP. Note that cumulative impacts on the environment will be able to be formally assessed by the EPA in the strategic environmental assessment process under amendments that are before Parliament to the *Environmental Protection Act 1986*.

**Item 19      Text, p 36**

*Sustainability assessment is designed to work through the social and economic issues in a transparent way (similar to that for environmental considerations) and then to find integrated solutions where tradeoffs are minimised or non-existent wherever possible. It is about ‘win-win-win’ or net benefit.*

**Comment**

Water resources, including wetlands, in WA since European settlement have largely been a major item traded off when development occurred. The matter of trading off any remaining water resources needs careful consideration, particularly in areas that are close to their allocation limits or in areas that are currently in a pristine condition (such as in the far north). Clear direction from Government through the development and approval of the State Water Strategy and the State Water Conservation Strategy will assist in this regard.

**Item 20      Text, p 40**

***Programs, policies and agreements***

*Government has made an election commitment to ensure that agencies incorporate sustainability principles into their activities and many agencies have been building sustainability into policies and programs. The Department of the Premier and Cabinet will continue to provide advice to government agencies on how to use sustainability as the basis for developing and reviewing programs, policies and agreements. The Sustainability Code of Practice will include guidelines for government agencies on policy development and sustainability assessment of policies, programs and agreements.*

**Comment**

The Government and Department of Premier and Cabinet are to be commended for taking this initiative. New resources will be needed in agencies that are key to implementing sustainability, such as DEWCP, so that each agency can develop a Code of Practice and a Sustainability Action Plan, and then implement such new procedures (at least one new Level 6 staff member per agency is suggested for this initiative). Auditing of these initiatives to ensure that they have been undertaken in a timely and satisfactory manner (and in a standard format) should be done by an independent authority.

**Item 21      Text, p 45**

***EMBRACING SUSTAINABILITY IN GOVERNMENT AGENCIES***

*Government needs to lead by example on workplace sustainability and a range of agency sustainability innovations will be implemented.*

*Agencies will develop a Sustainability Action Plan to respond to the Sustainability Code of Practice and comprehensively address how sustainability will be pursued.*

## Comment

Some agencies, including the DEP and WRC, have developed policies such as the eco-office program (under the previous Government) or commenced this task. Both the *modus operandi* and the policies developed (or being developed) should be reviewed for consistency with present Government policy, with the eco-office initiative used as a model. Agencies will need the assistance of the Sustainability Unit to develop and implement Sustainability Action Plans in a standard format. DEWCP is currently developing a new Strategic Direction, in consultation with the community, which will aid in this process.

### Item 22      Text, p 47

#### *Applying sustainability principles*

*Agencies will review and amend their existing strategic and operational plans to:*

- *incorporate sustainability principles*
- *reflect any commitments they are responsible for under the State Sustainability Strategy*
- *adopt additional measures that are available to implement sustainability principles in agency operations.*

## Comment

This statement is fully supported. The Department of Premier and Cabinet (Sustainability Unit) should lead policy direction for this task, so that plans are developed in a standard format (and completed by an agreed deadline), and then subjected to periodic independent audit. Some form of coordination among agencies of common actions will also be needed. Without this oversight, this program is unlikely to succeed.

### Item 23      Text, p 48

#### ***Box 10: GOVERNMENT WIDE PROGRAMS . . .***

##### *Water use*

*Government properties will demonstrate best practice in water use efficiency through water wise gardens, bores, rainwater tanks, gray water recycling and water efficient appliances (see Sustainability and Settlements: Our water future).*

## Comment

The statement is fully supported. These initiatives are proceeding, and both a State Water Conservation Strategy and State Water Strategy are in development to provide direction.

### Item 24      Text, p 49

#### ***Monitoring and reporting on agency achievements and commitments to Sustainability***

*Triple bottom line reporting in government agencies will be trialed with selected agencies. These agencies will prepare their annual reports against a triple bottom line framework and include additional information in terms of the social and environmental aspects of their operation. The success of this will be reviewed with a view to making this a government-wide requirement in years to*

come. Agencies could also choose to prepare a separate triple bottom line report as the Water Corporation has already done.

### **Comment**

This statement is fully supported. It is suggested that DEWCP be one of the agencies used to trial this approach.

### **Item 25      Text, p 50**

#### ***Proposed actions***

- 1.5 *Incorporate sustainability principles and practices into the legislation administered by relevant government agencies as it comes up for review or drafting.*
- a. *Develop a Sustainability Code of Practice in consultation with government agencies to provide direction and guidance for how government agencies should plan for, manage, and report on and operationalise sustainability. The Sustainability Code of Practice will require agencies to create Sustainability Action Plans in order to put these programs into practice. A Sustainability Resource Guide will be developed to assist agencies in this process.*
- 1.7 *The Sustainability Code of Practice and Action Plan will incorporate a number of initiatives across government including requirements for:*
- *sustainability assessment*
  - *agency policies and decision making to incorporate sustainability*
  - *procurement policy*
  - *the Energy Smart Government Program*
  - *reducing vehicle use through individualised travel management processes*
  - *improving vehicle fuel efficiency and demonstrating the use of gas, hydrogen and biodiesel bus demonstrations*
  - *investigate how the government vehicle fleet and the electric train system can reduce greenhouse gases by purchasing equivalent carbon credits from Western Australian carbon sequestration projects*
  - *working towards achieving zero waste by 2020 and increasing recycling*
  - *reducing water use as outlined in the draft State Water Conservation Strategy*
  - *demonstrating sustainability innovation in building design and construction*
  - *purchasing renewable energy for an increasing proportion of electricity requirements in the most cost effective manner*
  - *ensuring transparent, participatory and engaging public processes are embedded in all aspects of agency activity.*

### **Comment**

DEWCP would be involved in proposed actions 1.5 - 1.7 at the appropriate time, but would require assistance from the Sustainability Unit to develop these Codes and Action Plans. Note that new resources will be needed in agencies that are key to implementing sustainability, such as DEWCP, so that each agency can develop a Code of Practice and a Sustainability Action Plan, and then implement such new procedures, in a timely and effective manner.

### **Item 26      Text, p 51**

#### ***PARTNERSHIPS FOR ACTION***

*The framework will address institutional accountability, alignment of state and local government policy directions and processes on sustainability, regional groupings of local government for responsibilities in different areas (see below), and common state-local government methodologies and resources. The partnership agreement should build on the draft State Sustainability Strategy and be completed in time for finalisation with the final State Sustainability Strategy.*

### **Comment**

This statement is fully supported. There needs to be more transparency and accountability for the way natural resources are managed in WA. To assist in this goal, the EPA will be engaged in NRM environmental performance audits. DEWCP will support these Audits by providing appropriate data to the EPA in a timely manner.

### **Item 27      Text, pp 55-57**

#### ***PLANNING FOR SUSTAINABILITY***

*Sustainability presents a new emphasis in traditional planning practice. The statutory planning tools to prepare, implement and review policies and plans offer a powerful mechanism to apply the principles of sustainability.*

### **Comment**

DEWCP will be involved in the development of any regional plan which has the potential to impact on natural resources, such as through comments on new Statements of Planning Policy (SPPs) and the development of EPPs. Note that:

#### 1. EPPs:

- are developed or reviewed by the EPA, an independent authority, through legislated public consultation processes (through the *Environmental Protection Act 1986*), and then finalized through the Minister for the Environment and Heritage;
- are whole of government legislation which binds the Crown
- are normally reviewed after 7 years
- include a prescribed area, environmental values and objectives, and a ‘program to protect’

#### 2. SPPs:

- are developed under the Town Planning and Development Act 1928, and are not whole of government in their application
- do not apply for most marine waters and offshore islands
- have restricted application for Crown lands
- are not retrospective in their application (i.e. they only apply to new Region Schemes or to amendments to Town Planning Schemes)

### **Item 28      Text, pp 59-60**

#### ***SUSTAINABILITY IN THE REGIONS***

*Sustainability means most when it is applied at a regional scale.*

*The sheer size of Western Australia means that there is enormous variation in environments, economies and communities. At the regional scale, however, the natural environment becomes more defined and the regional variation in land, water and vegetation less distinct.*

*The government will also investigate the potential role of Regional Development Commissions in supporting sustainability as part of the review of Regional Development Commissions Act 1993. The Regional Development Commissions will also be invited to support the development of Regional Sustainability Strategies and Regional Councils of Local Governments.*

### **Comment**

These statements are fully supported. DEWCP will be assisting Regional NRM groups to develop regional NRM strategies, so that (at a strategic level) the provision of funds under the NAP and NHT 2 can be better considered, accessed and then put to appropriate uses.

**Item 29**      **Text, p 66**

### ***RESEARCH AND DEVELOPMENT FOR SUSTAINABILITY***

*Sustainability requires innovation in the economy. Government leadership is required to ensure research and development assists the sustainability agenda.*

DEWCP will continue to do a variety of research to support sustainability. DEWCP will also want to be involved in the activities of the new Global Centre for Sustainability in WA, and to help determine research priorities and partnerships.

**Item 30**      **Text, pp 70-73**

### ***SUSTAINABILITY INFORMATION ONLINE***

*Information is critical to sustainability but it needs to be integrated and accessible.*

### **Comment**

DEWCP will provide information in a timely manner and in an accessible format to support this initiative. The development of ‘environment on-line’ may be done by DEWCP, if a bilateral submission for Treasury funding is supported.

## **CHAPTER 4 Contributing to Global Sustainability**

**Item 31**      **Text, pp 80-85**

### ***MAINTAINING OUR BIODIVERSITY***

*Conservation of Western Australia’s biodiversity, and the landscapes and seascapes that support it, is a key plank of sustainability. Further, we have an obligation to the global community to conserve these values. Giving meaning to sustainability involves reversing the decline of the biodiversity of Western Australia.*

**Comment**

Whilst CALM would probably be the lead agency in this regard, DEWCP has an important role to play in biodiversity conservation. For DEWCP's role related to water resources, it is important to effectively address the management of water resources in WA, as biodiversity conservation is connected to this management (e.g. through salinity effects; water levels in caves; nutrient levels in estuaries; etc.). DEWCP sets environmental water provisions and environmental water requirements (EWP's and EWR's) to try to ensure that enough water is available to support biodiversity. DEWCP also provides policy advice to the EPA (e.g. on Bushplan), conserves biodiversity through the EIA process (and resultant Ministerial conditions and licenses) and EPP's, and undertakes environmental education through a variety of programs (e.g. Ribbons of Blue; AirWatch; WasteWise Schools; etc). Because of our extensive role in biodiversity conservation across WA, DEWCP should also be part of the Biodiversity Research Consortium, listed under the proposed actions.

**Item 32      Text, pp 86-88*****RESPONDING TO GREENHOUSE AND CLIMATE CHANGE***

*A comprehensive Greenhouse Strategy is being developed to address the issues of greenhouse emissions, adaptation, sequestration and new industries.*

**Comment**

DEWCP has been involved in the development of this Strategy by providing policy advice and technical information, and by assisting the EPA in the development of a position statement on industrial emissions. DEWCP anticipates the release of the draft Greenhouse Strategy by Government, and is already trying to reduce emissions through such initiatives as land clearing controls, Travel Smart and Cleaner Production strategies, and through indirect means such as environmental education (e.g. AirWatch and WasteWise Schools).

**CHAPTER 5 Sustainable Use of Natural Resources****Item 33      Text, p 93*****SUSTAINABLE USE OF NATURAL RESOURCES***

*Western Australia's 20,000 km coastline is largely undeveloped and relatively pristine. Some areas of the coast are developing rapidly and in need of careful management while others are under considerable threat of cumulative impact or have become degraded or irreversibly damaged and require more urgent or remedial action. Western Australia's marine and inland waters are vitally important natural assets that are used for many and sometimes competing uses. While the marine environment remains relatively untouched, the same cannot be said for our inland waters, which are heavily impacted by surrounding land use and management.*

**Comment**

The above statement is fully supported. A discussion paper on the Coastal Zone EPP is being developed for the EPA by the EPA Service Unit of DEWCP. Note that, under

WestPlan obligations (WA Marine Oil Pollution Emergency Management Plan) as part of the National Plan, more resources are needed for an effective Marine Oil Spill Response.

**Item 34      Text, p 94**

*In addition, the Department of Environment, Water and Catchment Protection is allocating water based on biophysical research, economic analysis and community values reflecting the extent to which water should be allocated to the environment.*

**Comment**

A proposal for NRM charges for water allocation will be presented to Cabinet in 2003, which would (if approved) provide additional funds to assist better water management across WA. The ongoing drought and climate change in the Southwest is exacerbating this situation, requiring Government attention, such as through new strategies (State Water & State Water Conservation) and NRM charges.

**Item 35      Text, p 95**

***SUSTAINABLE AGRICULTURE***

*Biodiversity, Salinity and soil acidity, Water quality, availability and drainage, Greenhouse gas emissions and climate change and Weeds, pests and diseases*

**Comment**

The comments made under the above heading are fully supported. The following statements in the Strategy underpin the urgency to properly address all of the water related problems outlined in the SOE report 1998.

***Salinity and soil acidity***

*Salinity is considered to be the greatest environmental threat to Western Australia and impacts significantly on broadacre agriculture, biodiversity, water supplies, rural towns and infrastructure such as roads.*

***Water quality, availability and drainage***

*Water quality in the South West of Western Australia is declining due to processes such salinity, sedimentation and eutrophication, and agriculture is a significant contributor to this decline. In addition about 45% of Western Australia's water use is for agriculture and the future development of agriculture depends on continued access to water resources. Irrigation could come under increasing pressure from competing uses such as public water supply and industrial uses.*

The authors are to be commended for distilling out these issues in such a frank manner. For all of the strategies and activities proposed in the past, water related matters in WA continue to be at issue. Salinity is a good example. We have known about its cause and effect since 1928, books have been written about it and numerous committees have looked into it. WA has more recently had in place a Salinity Council and a Salinity Action Plan; it now has an NRM Council and funding (soon) under the National Action Plan for Salinity and Water Quality, as well as direction through the Government's Response to the Salinity Taskforce.

However, with regard to water quality, engineers and chemists have for a century considered that if water quality was acceptable, there was no significant water problem. In this dry land where water allocation is often near the maximum, the major problem is often not water quality *per se*, it is sufficient water quantity. Since European settlement, water has been regularly allocated away from the environment, at times on too great a level, on a development needs basis. This situation is changing, with better data informing decisions recently. Secondary salinity pressures require an effective Governmental response, on a priority basis, using the Salinity Investment Framework.

**Item 36      Text, p 100**

***BOX 2: ENVIRONMENTAL MANAGEMENT SYSTEMS AND ACCREDITATION FOR SUSTAINABLE AGRICULTURE***

*The Commonwealth and State governments have been working together to investigate the opportunities and possibilities associated with environmental management systems in agriculture. Similarly, the World Wildlife Fund for Nature and others have been investigating the place of accreditation for sustainable agricultural systems. This work is in recognition of the international trends in the adoption of environmental management systems to other forms of primary production and the possible application to simultaneously assist with making agriculture more sustainable and benefiting agricultural producers.*

**Comment**

It is very important to adopt environmental management systems (EMSs) within both government and private industry for the implementation of sustainable development. One reason why there has been a problem with ‘good governance’, ‘separation of powers’, ‘conflicts of interest’, ‘blurring of responsibilities’ and the lack of outcomes, etc in natural resource management is because management is too often reactive, and tries to keep a host of stakeholders with divergent interests satisfied for the short term. To address this situation better it is not just a resource related matter. It is a cultural matter, and a lack of an open, community based system of priority setting (and performance audits that are made public) is what needs to be addressed. The pitfalls of a short term approach would be exposed if EMSs were used, particularly within Government.

**Item 37      Text, p 101**

***Proposed actions***

- a. *Develop regional targets for sustainable resource use for incorporation into regional natural resource management plans.*
- 3.36 *As part of the State-Local Government Partnership Agreement, establish regional councils and other processes that can meaningfully involve local government in issues of agricultural sustainability, particularly regional drainage, biodiversity conservation, regional revegetation programs, water quality and soil acidity. Local governments could then incorporate regional sustainability priorities into their local town planning schemes.*
- 3.36 *Develop with industry participation, standards and best practices for agricultural systems at regional and enterprise scale to provide the basis for accreditation of sustainable agriculture practices and to support regulatory processes.*

## Comment

DEWCP could be involved in activities that involve achieving sustainable agriculture through our roles related to drainage, biodiversity, revegetation, air quality, water quality (& water allocation at Statewide and regional levels), soil acidity, groundwater etc., for matters at three inter-related scales:

- Statewide matters, such as the State's coastal waters and ambient air quality EPPs (in development);
- Regional matters, such as local water and air shed management and protection around Cockburn Sound/ Kwinana and Kalgoorlie; and,
- Catchment matters, such as Riverplan and the SCCP for the Swan – Canning River

### Item 38      Text, pp 118 - 117

#### ***PROTECTING AQUATIC SYSTEMS***

*There are many threats to our aquatic systems—wetlands, rivers and estuaries—and it is an enormous challenge to protect and enhance these precious assets.*

*From our perspective as a community group dedicated to the conservation of wetlands we would like to see some emphasis placed on the need to conserve biodiversity and water resources in the State Sustainability Strategy. Wetlands Conservation Society*

## Comment

The authors have emphasized the generally deteriorating state of WA's aquatic systems. In this regard, all items in this submission relating to the effective management of WA's water resources should be considered in a holistic manner.

When one reviews progress in WA with respect to implementing the National Water Quality Management Strategy (NWQMS), there may be a governance issue that needs addressing. This issue is similar to that of CALM previously having conservation and regulatory/fee gathering roles for forest management. For water management, this issue needs to be considered in the context of the history of the water industry, the continued deterioration in water quality and the information on water needs for the environment, prior to allocating water.

The draft State Sustainability Strategy should put greater emphasis on the necessity to take a holistic approach to water resource protection (for the environment), as noted in the National Water Quality Management Strategy.

### Item 39      Text, pp 119

#### ***Vision***

*The hydrological processes of all aquatic systems are understood. Community-derived environmental values are set for each water system and they are managed through an Environmental Protection Policy and Statement of Planning Policy.*

**Objectives**

- *Improve understanding of aquatic systems.*
- *Protect aquatic systems of high environmental, scenic and heritage significance.*
- *Manage aquatic systems to agreed conditions for a range of environmental values.*
- *Incorporate social and cultural values when managing aquatic systems.*
- *Increase community awareness and involvement in the management and protection of aquatic systems.*

**Comment**

The above vision and objectives are to be commended. It is noted, however, that a cultural change in our manner of water resource management would be required for this to happen (see **Item 36**).

**Item 40**      **Text, pp 119****Actions underway include**

- *The State Water Quality Management Strategy is being developed for implementing the National Water Quality Management Strategy in Western Australia.*

**Comment**

This comment is true but it needs clarification. Only one document (Framework for Implementation) has been produced in May 2001. That document reiterated much of the policies and principles of the NWQMS and outlines each Government Agency's responsibilities in WA and how all agencies would interact. Reference is also made to community and local Government involvement.

EPA Bulletin 1078 will become part of the SWQMS series at some stage if it is adopted by Government. A draft Implementation plan has been written, but it will have to be redrafted if Bulletin 1078 is adopted.

- *The Swan-Canning Environmental Protection Policy and the Swan Canning Cleanup Program have been implemented in the Swan region.*

**Comment**

The above EPP is being adjusted to include Riverplan so that the linkages between the EPP and the Swan Canning Cleanup Program are well integrated and transparent.

**Item 41**      **Text, pp 120 - 121****Proposed actions**

- 3.36 *Protect water dependent ecosystems while allowing for the management of water resources for their sustainable use and development to meet the needs of current and future users.*
- 3.37 *Ensure that the full social, environmental and economic values of aquatic systems and the impacts of development are taken into account in decision making and planning processes.*

- 3.38 *Identify the environmental values and designate environmental quality objectives for all of the State's aquatic systems and embed these within Environmental Protection Policies.*
- 3.39 *Increase the scientific understanding of aquatic systems to derive environmental quality criteria for the state's aquatic ecosystems to act as benchmarks to assess where the objectives are met or not met and management action is required.*
- 3.40 *Ensure that activities in catchments are actively managed to ensure that environmental values of downstream environments are not compromised degraded or destroyed through management, community partnerships and legislation.*
- 3.41 *Continue the work of the State Wetlands Coordinating Committee in ensuring the State Wetlands Conservation Policy is implemented.*
- 3.43 *Ensure the protection of our wild and scenic rivers and develop management plans, in partnership with Indigenous peoples, for the safeguarding of these unique river systems.*

#### **Indicators and targets**

- *Proportion of Western Australia's aquatic systems with designated Environmental Values, Objectives and Criteria.*
- *The areal extent over which the environmental values are protected in each aquatic system.*
- *The proportion of new development proposals that is consistent and compatible with the designated environmental values.*

#### **Comment**

DEWCP, particularly the EPA Service Unit, would have significant input into the above proposed actions and target setting. After the State Water Strategy and the State Water Conservation Strategy are approved, these actions will need to be reconsidered.

#### **Item 42      Text, pp 122 – 126**

#### ***SUSTAINABLE COASTAL AND MARINE ENVIRONMENTS***

*The coast and the marine environment are highly significant to Western Australians; many of our settlements cling to the coast and much of our recreation, leisure and tourism rely on the ocean, beaches and surrounds.*

#### **Comment**

Note that there are ecological overlaps between these sectors and freshwater ecosystems, particularly in estuarine environments. The discussion paper for the proposed Coastal Zone EPP is highlighting this issue, since the area where the EPP would apply needs definition. The Coastal SPP, which is in development as well, has a much more restricted application (see **Item 27**).

#### **Item 43      Text, p 129**

#### ***SUSTAINABLE RANGELANDS MANAGEMENT***

***Proposed actions 3.51, 3.53, 3.54, 3.55*****Comment**

These actions need to be considered by the NRM Council. DEWCP supports the NRM Council through staff in the NRM Office. However, a dedicated fund is needed for DEWCP to provide this support.

**CHAPTER 6 Sustainability and Settlements****Item 44      Text, p 135*****MANAGING URBAN AND REGIONAL GROWTH******Strategies 4.3, 4.5, 4.6*****Comment**

DEWCP has provided detailed environmental and strategic advice on Future Perth and should be involved in further discussions and planning on this initiative. DEWCP has also provided assistance to the EPA on the development and implementation of Bush Forever in Metro Perth, particularly through the EPA Service Unit – this program could be expanded to include regional urban centres through Country Bush Plan, if funding is made available. The Gnangara Mound EPP is under review, and DEWCP provides advice on water sensitive urban design through its Urban Storm Water Management program, and related initiatives.

**Item 45      Text, pp 145-147*****PRESERVING AIR QUALITY***

*An Air Quality Management Plan has been developed for Perth and this needs to be implemented to prevent air pollution reducing quality of life in the city.*

**Comment**

DEWCP has a significant role with regard to air quality, including providing technical assistance in the development and revision of EPPs (e.g. for Kwinana and Goldfields SO<sub>2</sub>). A statewide ambient air EPP is in development to apply NEPM standards for six air pollutants. The Travel Smart program and Perth AQMP are two means that DEWCP is using to improve air quality in the Perth Metro region. Sufficient resources will have to be provided to Perth AQMP for its implementation to keep moving ahead (its funding is proposed to end in mid-2004). Note that these air quality issues also need to be linked to initiatives to address greenhouse gas issues, and that DEWCP is developing internal processes to better link procedures under Parts IV and V of the *Environmental Protection Act 1986*.

**Item 46      Text, pp 148 – 150*****REDUCING AND MANAGING WASTE***

*Reducing and managing wastes in settlements is fundamental to ensuring a healthy environment and good quality of life. Recent management experience has revealed continuing improvement and innovation in solid waste management but problems with hazardous waste.*

### **Comment**

DEWCP has a direct role in providing policy advice related to waste management to the Waste Management Board (refer to proposed actions 4.41, 4.42, 4.44, 4.46, 4.47). The eco-office program, pioneered by the DEP, is a model being applied across DEWCP – this model could also be adapted for use across Government and could be applied to business (proposed actions 4.45, 4.48). At a more strategic level, DEWCP has helped to develop the Contaminated Sites Bill, and is developing the Waste Management Bill with the assistance of the Waste Management Board (WMB). The WMB is also developing a strategic plan for waste management across WA. DEWCP does not necessarily support the establishment of five resource recovery precincts (proposed action 4.51); instead, at least one hazardous waste precinct is needed, and a bilateral has been forwarded to seek funds for this initiative.

### **Item 47      Text, p 151-153**

#### ***OUR WATER FUTURE***

*The sustainability of our water supply is an issue of concern to many Western Australians, especially those who live in the South West. There is a need to provide a vision for the future, new sources of supply and new ways to save water.*

### **Comment**

A number of comments have already been made about water management in previous items. With regard to the proposed actions, DEWCP has released draft guidelines on the Reuse of Greywater (early 2002), a draft Water Conservation Strategy (mid-2002), was involved in the State Water Symposium (late 2002), drafted for the EPA an implementation framework for the NWQMS (EPA Bulletin 1078, Nov 2002), is involved in the development of the State Water Strategy, and is developing a statewide policy for Waterways WA.

DEWCP is also developing a proposal for NRM charges for water allocations across the State, to go to Cabinet for review in 2003. These charges, if approved, would provide additional funds to DEWCP to assist in improving water management. In particular, new funding is needed for the development of Water Source Protection Plans; a bilateral request is being forwarded to assist in this initiative.

Initiatives related to proposed action 4.58 were announced in mid-Feb 03 by the Premier; DEWCP helped to develop the details for this program of household water conservation.

## **CHAPTER 7 Sustainability and Community**

### **Item 48      Text, Pp 182-183**

#### ***EDUCATION AND COMMUNITY AWARENESS FOR SUSTAINABILITY***

DEWCP has developed a detailed strategy and action plan on Environmental Education that was forwarded in 2002 to the Minister for the Environment and Heritage; a discussion paper drafted by DEWCP on Waste Minimisation Education was also released by the Waste Management Board in late 2002. DEWCP is responsible for environmental education in a number of programs, including: Ribbons of Blue; WasteWise Schools; AirWatch; Travel Smart; and, Captain Clean-up. DEWCP should therefore be directly involved in proposed actions that develop and deliver aspects of sustainability education (refer to 5.18, 5.19, 5.25, 5.28, 5.29).

## **CHAPTER 8 Sustainability and Business**

**Item 49**      **Text, p 205**

### ***ECO-EFFICIENCY AND INDUSTRIAL ECOLOGY***

Through policy advice to the Waste Management Board, DEWCP is involved with several initiatives related to eco-efficiency and industrial ecology. These include, for example: cleaner production; the industrial waste exchange program; the National Packaging Covenant; and, the eco-office program. DEWCP will consult with the WMB about the development of an eco-industries section within DEWCP (see 6.12). DEWCP does not support ecolabelling programs due to problems in accrediting this system (see 6.16).