

ENVIRONMENTAL PROTECTION AUTHORITY

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Dear Professor Newman

FINALISATION OF DRAFT STATE SUSTAINABILITY STRATEGY

Thank you for the opportunity to comment on the consultation draft of the Western Australian State Sustainability Strategy.

My comments are attached for your consideration. The thrust of my comments supports the draft strategy and commends it on its frankness regarding matters such as good governance and the current state of the environment. Given that the Environmental Protection Authority (EPA) is the key independent advisor to the Government on environmental matters, it would be valuable for the draft strategy to articulate more clearly how the roles of the EPA (environmental impact assessment, natural resource auditing and state of the environment reporting) dovetail with the proposed triple bottom line assessment.

Yours sincerely

Bernard Bowen
CHAIRMAN

12 March 2003

THE ENVIRONMENTAL PROTECTIONS AUTHORITY'S COMMENTS ON THE CONSULTATION DRAFT OF THE STATE CONSERVATION STRATEGY

Preamble

Foresight

This is a very important draft strategy. The authors are to be commended for the frank manner the issues are presented, including governance issues. Had the strategy been written when most of the current environmental issues were first recognised, the environmental condition may have been much better

Triple bottom line assessment

When finalised, triple bottom line assessment should link closely with the Environmental Impact Assessment, State of the Environment Reporting and Natural Resource Management Auditing roles of the EPA. It would be useful if the draft strategy were to articulating how the independent roles of the EPA and the functions of the proposed Sustainability Unit might work. The EPA's view is that sustainability assessment should build upon the strengths of the existing EPA processes but not replace them.

Level playing field

It is suggested that, in the future, not only should triple bottom line assessment protect the environment, it should also consider the possibilities of remediation to compensate for poor past decision-making. It would be valuable to emphasise this point in the draft strategy.

Lack of will in the past

The authors are to be commended for acknowledging that there has been a lack of will on behalf of past Governments and their agencies to address environmental problems.

Good governance

The authors are to be commended for pointing out that good governance is fundamental to implementing triple bottom line assessment. Interestingly, an independent and public review of the WA Water Service Coordination Act is being undertaken. One of the major matters under review is the blurring of roles between regulators, day-to-day resource managers, retailers, and policy formulators. Some of the outcomes of good governance are the separation of powers, transparency of processes, and the adoption of formalised environmental management systems (EMS). Essential components of an EMS are: vision, goals, implementation plans, monitoring of performance, auditing performance against benchmarks and reviewing the process.

Water quality, quantity and the holistic approach

The EPA agrees with the draft strategy in that the 'silo approach' of management being inherently problematic. Arguably, of the three elements comprising Natural Resource Management (NRM) (air, land and water), water is the most important in Western Australia as life (& biodiversity) depends on it, both in terms of water quality and quantity. For historical reasons, emphasis has largely been placed on water quality protection only. Ironically, in spite of that emphasis, water quality has continued to deteriorate in the SW of WA.

Over the past twenty years the rainfall in the SW of WA has declined, the population has increased, available surface water has decreased, and wetlands, river beds and caves have become drier. This is likely to have had a significant effect on aquatic biodiversity and dependent biodiversity. Much of the above has occurred because of sectoral interests not taking a holistic approach. It is noted that the holistic approach to water resource protection, as signed off by Government in the National Water Quality Management Strategy should be emphasised in the draft strategy.

Resource implications to the Environmental Protection Authority

The draft strategy suggests that a section of the Sustainability Development Unit might be located within the EPA Service Unit. Given that some of the EPA Service Unit's roles are SOE reporting, NRM auditing, environmental policy development and EIA, such an initiative has merit.

Layout of detailed comments

The following comments are specific. The relevant text will be quoted in italics accompanied by the appropriate page number(s).

Specific Comments

Item 1 Text, p 9

Sustainability and governance

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 the successful adoption of the strategy. Government agencies that have resource use and environmental protection roles have struggled in the past to give due regard to environmental protection.

Some of the roles that the day-to-day water resource manager has are:

Resource exploitation

- Allocating and regulating water extraction from the environment to retailers;
- Day to day manager for protecting water resources as a commodity;
- Acting as a proponent for sectors of the water industry during the EPA assessment of water extraction proposals;
- Having Ministerial Conditions placed upon it as a proponent for water extraction from the environment (and being in breach of them);
- Carrying out research with emphasis on water extraction from the environment to for supply to retailers;
- Licensing extractors of water from the environment at minimal cost; and
- Writing policy for water extraction from the environment

Environmental protection

- Day to day manager for protecting aquatic ecosystems/habitats/biodiversity to maintain environmental integrity;
- Providing environmental advice to EPA on water allocation and aquatic ecological matters;
- Protecting the environment on a day to day basis and reporting to EPA on its own water management performance; and
- Writing policy for aquatic environmental protection

Item 2 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

The statement is supported, particularly in reference to simultaneous improvement. It is noted that the EP Act 1986 defines the scope of what EPA could comment on regarding the three elements of triple bottom line assessment. The EPA would continue to report to Government on environmental and some social matters

affecting or likely to affect the environment. The EPA would anticipate that whatever body that reports to Government regarding the triple bottom line, it would give due regard to EPA's advice to Government.

The incorporation of social assessment expertise within the EPA Service Unit would help to integrate and streamline decision-making. It would complement the other roles of the EPA as stated above.

Item 3 Text, pp 11 – 12

Sustainable use of natural resources

Much of Western Australia's wealth and sense of identity comes from the use of natural resources. Agriculture, forestry, fishing and the production of mineral and petroleum all provide employment, development opportunities and wealth. Tourism is also a significant contributor to the economy and relies heavily on the natural assets of the state. However, there are significant sustainability challenges to many of these sectors and action must be undertaken to address these. The sustainable use and management of aquatic systems, the cost and marine environment and the rangelands deserves special consideration because of their significant scale and importance to the Western Australian community.

Comment

The EPA would have a direct link to the above through its role in SOE reporting, NRM auditing, EIA and environmental policy (EPP, EPA Position and Guidance Statements) development.

Item 4 Text, p 12

Aquatic systems

Many of our aquatic systems are under stress from surrounding land uses. The government has begun a process of developing Environmental Protection Policies on aquatic systems based on community values and scientifically derived water quality objectives.

Coastal and marine

Coastal areas 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. A Taskforce recently reviewed the structural arrangements for coastal planning and management in Western Australia and highlighted the importance of sustainability as a driving concept for future coastal planning. In significant areas the sustainability of coastal areas will need to be supported through statutory planning procedures.

Rangelands

There is on-going concern about degradation of the rangelands, the commensurate loss in productivity and profitability and the loss of social capital. New approaches and commitments to pastoral sustainability are emerging. There is potential to plan for and provide a sustainable future for the rangelands that accommodates a diversity of land use and activity.

Comment

Same comment as per item 3

Item 5 Text, 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: Environmental Policy

Comment

The establishment of an ESD unit is supported. For maximum benefit, an efficient working relationship between it and the EPA would be desirable.

Item 6 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 CO₂ 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

This above statement is very relevant to WA because of the drying and erratic climate and low water recharge rates. Accordingly, the governance of water management needs to be addressed. See comments relating to item 1.

Item 7 Text, p 25

A number of submissions suggested the sustainability consultation document did not sufficiently emphasise the economic dimension of sustainability.

Comment

Whilst most stakeholders will understandably interpret 'sustainability development' through their own sectoral needs, it is unquestionable that since European settlement, environmental issues have escalated primarily because economic imperatives have dominated. Even since the first Environmental Protection Act was proclaimed in the early 70's, environmental issues have become more acute, arguably at a slower rate. However for water resource protection, the problems continue to escalate.

Item 8 Text, p 28

Precaution

Sustainability requires caution, avoiding poorly understood risks of serious or irreversible damage, designing for surprise and managing for adaptation.

Comment

All of the foundation principles noted on p28 are appropriate. However, the challenge to adopting the 'precautionary principle' should not be underestimated. In the 1920's salinity was not only identified as an issue but was reasonably well understood. It was not for the lack of information that caused the salinity problem to deteriorate to its present state. It was due to short-term planning having no regard for the escalating environmental problem. This is well stated in Box 5:

*One of the key characteristics of sustainability is the decoupling of resource use and wealth. **For most of the past two hundred years it has been assumed that as wealth increases then so will the consumption of resources such as energy, minerals, water and land.***

Item 9 Text, p 29

Box 5

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

This is a curious statement. It is generally acknowledged that over the past 25 years water resource problems in WA, especially in the more populated South West, have become acute. The following are a list of matters that might be considered before the draft strategy is finalised:

- Environmental water allocations have not been considered in any scientific way until very recently in WA by resource management agencies;
- Water quality (salinity, eutrophication, sedimentation and turbidity etc) continues to deteriorate in WA resulting in more pressure on the ever diminishing water of high quality;
- The drying climate in the SW of WA continues to impact on the available quantity of water for the environment;
- The increasing population demand for more water in WA has resulted in decreased environmental water flows. Each time a dam is built, water is diverted away from the environment resulting in a loss of downstream 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. Some riverbeds, wetlands and caves etc are drying significantly. (Attention could be given to the National Principles for the Provision of Water for Ecosystems 1996. This document is currently being revised because the water industry could not meet the original principles that it had agreed upon);
- Some of the Ministerial Conditions placed on day-to-day managing agency for water resource protection are being breached (Gnangara Mound);
- In some cases there is insufficient information to calculate water balances for significant water resources even though water allocations away from the environment are still being permitted; and
- The licensing of water extractors across the State is far from complete. In some cases there is a lack of knowledge regarding how much water is available and how much is being extracted from the environment

Item 10 Text, p 30-31

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

This statement is supported. See comment for Item 1 re governance matters in the water resource sector

Item 11 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. It is anticipated that 'sustainability assessment' would dovetail with the roles of the EPA. However, it is noted that it has taken a long time for the public to understand the roles and workings of the EPA. To date, some members of the public still confuse the DEP with the EPA. It is important that any stakeholder or public confusion is not further compounded with the introduction of 'sustainability assessment' given the statutory functions of the EPA. It is suggested that the final strategy articulates how the EPA assessment process dovetails with 'sustainability assessment'.

Item 12 Text, p 36

*The establishment of a sustainability assessment process will be a major step forward in simplifying and creating a more effective decision-making process. It is not an easy process to change due to **the silos of government and disciplines of professions**. It will require slow and careful trials to establish the processes and a long-term commitment to build capacity across government and society.*

Comment

The above sentiment is supported. This support should be read in conjunction with previous comments regarding 'separation of powers', 'good governance', and the curious blend of roles carried out by the day-to-day water resource agency.

Item 13 Text, p 36

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

Comment

See earlier comment in the preamble regarding trade-offs against the environment. See also comments in item 1 regarding the state of water resources in the SW of WA, 'good governance' and the 'separation of powers'.

Item 14 Text, p 38

In particular there is a need for three Sustainability Assessment Units to provide capacity for the implementation of sustainability assessment within the areas of environmental, social and economic sustainability. The three Sustainability Assessment Units will be established within:

- *Environmental Protection Authority Services Unit with responsibility for environmental assessments related to sustainability*

- *Department for Planning and Infrastructure with responsibility for social assessments related to sustainability*
- *Department of the Treasury and Finance with responsibility for economic assessments related to sustainability.*

These units will need to liaise closely with each other and with other relevant agencies with experience on the particular PPPP (projects, programs, plans and policies) under consideration.

Comment

The above proposal is supported. One could consider the potential consequences on ‘sustainability assessment’ if the Sustainability Assessment Unit is fragmented across three agencies that may have mutually different goals.

Item 15 Text, p 40

Program, 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 ‘Sustainability Assessment Unit’ should be aware of, not only Environmental Protection Policies but also National Environment Protection Measures, EPA Position Statements and EPA Guidance Statements.

Item 16 Text, p 43

Proposed actions

3.36 Required the Sustainability Policy Unit to:

- *Support sustainability assessment*
- *Assist agencies in implementing the State Sustainability Strategy within their own areas of responsibility*
- *Coordinate sustainability reporting across government*
- *Provide general policy advice on sustainability and monitor implementation of the State Sustainability Strategy*
- *Support regular communication and information exchange for capacity building in sustainability across the public sector*
- *Provide community education programs on sustainability including the State Sustainability Strategy process.*

Comment

The EPA would anticipate that the EPA Service unit would play a significant role in the above in so far as it pertains to the environment and NRM with the exception of dot point 3.

Item 17 Text, p 45

EMBRACING SUSTAINABILITY IN GOVERNMENT AGENCIES

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

Government agencies should at least minimise their own ecological footprint, by adopting eco-efficient office operations, critically reviewing transport and travel and inclusion of environment and sustainability criteria in government purchasing and contracting. “The government cannot urge sustainability on the rest of the

community without putting its own house in order. Leadership must be provided in the first instance by the Premier, Geoff Gallop, and by the relevant Ministers in the departments and agencies under their control.

Quote – Environmental Alliance

Comment

This statement is fully supported. It is also important that some sort of audit is established to ensure the above happens.

Item 18 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*

Through the Sustainability Action Plan agencies will be required to put in place programs and resourcing consistent with this election commitment and respond to government-wide targets and initiatives including the following areas:

- *Sustainability procurement*
- *Waste reduction and recycling*
- *Energy use*
- *Water use*
- *Reduced travel, vehicle travel and vehicle fuel efficiency*

Comment

This statement is supported. See comment for item 18.

Item 19 Text, p 49

Monitoring and reporting on agency achievements and commitments to Sustainability

Triple bottom line reporting in government agencies will be trialled 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 supported. The strategy should articulate how it anticipates EPA's roles in NRM auditing and SOE reporting dovetails with triple bottom line reporting in government agencies.

Item 20 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.*
- 3.36 *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

The EPA supports all of the above proposed actions. Whilst EPA is independent, EPA would be conscious of all of the principles underpinning sustainable development when drafting Guidance Statement for EIA, Positions Statement form matters in general, and EPPs in addition to giving advice to Government..

Item 21 Text, p 51

*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 completed in time for finalisation with the final State Sustainability Strategy.*

Comment

This statement is supported. See earlier comments regarding good governance, separation of powers, transparency of processes etc.

Item 22 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

This statement is supported. It would be useful to articulate how the planning process and the roles of the EPA come together and contribute to the triple bottom line assessment.

Item 23 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

This statement is supported. It is noted that the most significant environmental issues are in regions yet the mechanisms to resolve or improve them largely resides in Perth. Accordingly, regional bodies need to be properly empowered and resourced.

Item 24 Text, pp 70-73

SUSTAINABILITY INFORMATION ONLINE

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

Comment

This statement is supported. See earlier comments regarding role of the EPA. For the EPA to function properly it relies on advice and data provided by various government agencies. The quality of this advice is likely to be reflected in the advice EPA gives government.

Item 25 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

This statement is supported. See earlier comments regarding EPA's roles. EPA plays an over-arching role in NRM audit and SOE reporting. Central to those roles is the conservation of biodiversity. It would be valuable for the strategy to articulate how the EPA's roles dovetail with triple bottom line assessment as it pertains to the conservation of biodiversity.

Item 26 Text, p 93

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

This statement is supported. It is anticipated that the combination of SOE Reporting, NRM Auditing and Triple Bottom Line Assessment will help to arrest some terrestrial environmental problems. One of the obstacles to resolving some of the more obvious terrestrial environmental issues such as water management and broad acre land use is the 'silo' approach taken to resource management by government agencies. The matter has been already mentioned earlier in the draft strategy. The development of this draft strategy should go some way to breaking down the silo approach and foster a co-operative integrated approach.

Item 27 Text, p 100

BOX 23 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 agriculture 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 agriculture producers.*

Comment

This statement is supported. Some of the outcomes of a properly established EMS are good governance, transparency, accountability and auditability etc. It could be argued that many of the current environmental problems are due to lack of the above in the past.

Item 28 Text, p 100

.....*The major processes and outputs described in the framework are outlined below:*

-
- *natural resource management outcome targets*

Comment

See earlier comments regarding EPA's roles, specifically its involvement in NRM audit and how the draft strategy should articulate EPA's involvement in this matter.

Item 29 Text, p 101

Proposed actions

- 3.36 *Develop regional targets for sustainable resource use for incorporation into regional natural resource management plans.*
- 3.37 *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.*
- 3.38 *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

See comment to item 28

Item 30 Text, p 105

Fisheries management and sustainability is one of the good news stories in Western Australia. This is due to a powerful regulatory system and technology and resource for monitoring and reporting. The Western Australian Government has adopted a policy on the ecologically sustainable management of fisheries that is a world first.

A number of state government agencies are involved with planning for the marine environment:

- *The Department of Fisheries prepares fish habitat protection areas plans, aquaculture plans, fisheries management plans, regional recreational fishing management plans and fisheries environmental management plans.*
- *The Department of Environment, Water and Catchment Protection prepare water management programs for estuaries and inlets.*
- *The Department of Minerals and Petroleum Production plans for resource development in State waters.*
- *The Department of Conservation and Land Management plans for marine nature reserves, marine parks and marine management areas.*

Comment

Recently EPA submitted advice to the Minister for the Environment as to how marine and terrestrial waters should be protected (EPA Bulletin 1078). This involves:

- Identifying of the most significant water resources/bodies in WA,
- Identifying a lead agency (or agencies) that would consult with the community and stakeholders with regard to developing environmental values (EVs), environmental quality objectives (EQOs) and environmental quality criteria (EQCs)/target/benchmarks;
- The lead agency submitting the draft EVs, EQOs, EQC/Targets to EPA for assessment and endorsement; and
- EPA submitting its advice to government in this regard

The scope of Bulletin 1078 covers all significant fresh estuarine and marine waters. It is anticipated that this implementation process will be ongoing and carried out on a priority basis. Notwithstanding that, significant progress would be expected and the results would be distilled out in the NRM audit and SOE reporting role of the EPA.

Item 31 Text, p 107

Proposed actions

- 3.10 *Develop social and economic aspects of sustainability to integrate with environmental assessments completed on all Western Australian fisheries.*
- 3.36 *Develop a Marine Planning Strategy, including a cross-agency framework for integrated marine planning to ensure that marine and estuarine resources are adequately protected and managed across all habitats, within a bioregional framework. This framework should enable increased collaboration between catchments and land management agencies to manage resulting impacts on the marine environment and fisheries (see also Contributing to global sustainability: Maintaining our biodiversity).*
- 3.12 *Develop a long-term Inland Fish and Aquatic Ecosystem Strategy to rehabilitate freshwater ecosystems of the South West to conserve the biodiversity of the state's freshwater fish stocks.*
- 3.15 *Prepare and implement regional recreational fisheries management strategies and regional fisheries environmental reviews and plans.*

Comment

See earlier comment regarding the EPA's roles and those functions relating to EPA Bulletin 1078

Item 32 Text, pp 108 – 117

SUSTAINABLE FORESTRY AND PLANTATIONS

SUSTAINABLE MINING AND PETROLEUM PRODUCTION

SUSTAINABLE TOURISM

Comment

The EPA would be involved, under Pt 4 of the EP Act 1986, in the assessment of any proposal in the above categories which it choose to assess. Accordingly, as stated earlier, the strategy would need to clearly articulate how it is envisaged that triple bottom line assessment would dovetail with the independent assessment process of the EPA.

Item 33 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'. QUOTE Wetlands Conservation Society

Comment

The authors are to be commended for there frankness regarding the state of WA's aquatic systems. In this regard, all previous items relating to the management of WA's water resources should be considered as noted in this comment.

Item 34 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 supported. As noted earlier, EPA Bulletin 1078 would underpin the implementation of the above vision and objectives.

Item 35 Text, pp 120

Actions under way include:

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 revised. It is anticipated that revised EPP will be consistent with the vision and objectives outlined on p119 of this draft strategy and the EPA Bulletin 1078 with respect to setting Evs, EQOs and EQCs for each of the State's significant water bodies. Accordingly, it is important that the Sustainability Unit and the EPA Service Unit work closely on this type of activity before revised draft versions of the EPP are submitted to EPA for consideration.

Item 36 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 need of current and future users.*
- 3.37 *Ensures 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

The EPA would play a central role in many of the above activities. This should be articulated in the draft strategy. For instance EPA would have:

- A lead role in assessing any significant activity relating to Pt 4 of the EP Act 1986;
- A lead role in assessing EVs EQOs and EQCs (including indicators and targets) for each of the State's significant water bodies as proposed by a lead NRM agency,

- A lead role in SOE Reporting and NRM auditing; and
- A supporting role to NRM agencies that might be addressing environmental matters of concern.

Item 37 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

See comment earlier comments regarding EPA's roles and activities.

Item 38 Text, pp 127 – 129

SUSTAINABLE RANGELANDS MANAGEMENT

There is concern about on-going degradation of the rangelands and the commensurate loss in productivity and profitability, as well as the loss of social capital from the regions.

Proposed actions

- 3.51 *Establish a Rangelands Working Group of the Natural Resource Management Council to develop a comprehensive vision of the rangelands and advise government of the priority sustainability issues requiring consideration.*

Indicators and targets

- *Proportion of pastoral area under approved environmental management plans.*
- *Number of bioregions and sub-regions which have achieved appropriate levels of reservation for conservation.*

Comment

In addition to EPA's direct role in the assessment of projects relating to rangelands, EPA would also be auditing and reporting to Government on the environmental condition of rangelands.

Item 39 Text, pp 148 – 156

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.

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.

SUSTAINABLE ENERGY

The use of household electricity and gas, renewable fuels, transport fuels, commercial and industrial fuels are all opportunities for addressing sustainability through providing an efficient service to the economy, helping build communities and not harming the environment.

Comment

The EPA has a direct role in the assessment of projects relating to waste management, and water and energy use. The EPA is in the process of developing Guidance and Position Statements for specific issues, and EPPs for more general issues relating to EIA.