

27 February 2003

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Dear David

DRAFT STATE SUSTAINABILITY STRATEGY

Thank you for forwarding a copy of the West Australian State Sustainability Strategy, Consultation Draft. We have reviewed the document and provide the following comment for your consideration.

Firstly, your Division and the Sustainability Policy Unit should be commended for work done in producing the draft. My observation to date is that 'sustainability' means different things to different people, depending on their perspective, hence you risk drawing criticisms from many angles when embarking on such a difficult task. I believe the draft provides a sound basis for government to lead the sustainability journey, and contains issues of relevance spanning the whole of government. I also agree with the view that sustainability is a journey and see the consultation draft as presenting an excellent starting point for that journey, and no doubt it will be modified and improved as the journey progresses and our knowledge and views develop.

In light of the above, it is important for government to lead by example, if implementation of such an important initiative is to succeed. It is pleasing to see this approach being taken and recognition that government as a whole is ideally placed to encourage and influence others through policy, planning, approvals processes and purchasing power.

In respect to the actual content of the draft, I offer the following comments:

- i. The Government wide commitments contained in Box 10, like the majority of the consultation draft, appear to focus on environmental initiatives as opposed to the social and economic dimensions of sustainability and how to balance and maximise all of these dimensions. There is no doubt that a key aspect of the strategy needs to be government 'buy-in' and demonstration of commitment through improvements in the very visible areas such as energy and waste, and that this should motivate everyone to tackle harder issues. However, I suspect the greater challenge (and perhaps the area where government agencies will require greater assistance), lies in developing appropriate social objectives and processes for balancing these with the economic and environmental objectives. For example, the move towards alternative fuels and means of travel (although perhaps not a major component of overall strategy) may have associated higher risks for public safety. Will the shift to LPG vehicles increase the risk of fire/explosion? Does it bring higher cumulative risks to the community through increased storage, transport and refuelling? Are LPG vehicles involved in accidents more prone to fire/explosion? Does the move to public transport increase the risk to patrons (real or perceived) particularly after dark? The question is how do these social impacts (and perhaps other economic impacts) get addressed so that the outcomes in each dimension are maximised and improved?

- ii. Without wishing to dwell on Box 10 commitments, I am concerned that the initiatives such as annual energy savings, often offer little recognition to prior improvements that agencies may have implemented in recent years. I believe that, in this area particularly, improvements made by agencies over the last 2-3 years should be included in a cumulative target reduction for the period 2006-7.

The other questions that arise relate to the actual quantification of the energy savings? Is it a raw consumption figure, an expenditure figure, a consumption per FTE, consumption per floor area etc?

Overall, in respect to the commitments, where specific numerical targets are proposed, it would appear appropriate that the principles of sustainability be practised so that the objective becomes one of learning to apply sustainability, rather than simply the pursuit of a target figure.

- iii. I agree that the use of government's purchasing power is an excellent tool to demonstrate leadership and commitment in sustainability. Again, agencies will require good advice and support for this to be successful.
- iv. It is perhaps government's role in planning that presents the greatest opportunities for the visible application of sustainability principles. The consultation draft presents an excellent example of the application of sustainability principles to the planning process, through the Freight Network Review. The process of engagement with stakeholders, developing and understanding of what sustainability means to them, exploring the environmental and economic issues and then identifying options that maximise the outcomes for each of the three dimensions is one which should be highlighted and developed further.

Hence, I believe it is critical that there be a focus on the development of planning processes that enable decision making to be based on sustainability principles and that stakeholder confidence is built for such processes. Each of the dimensions are multi-layered (eg social impacts at a local level may be different to those at a regional level and national level etc), giving rise to a complex matrix for the decision making process. I believe it is this area that requires greater exploration and guidance so that government agencies can completely demonstrate that application of sustainability.

- v. A final thought is that the document probably needs to be a dynamic one. As mentioned previously, I view sustainability as a journey and our collective knowledge will increase rapidly as we travel this journey, hence the strategy will need to be revisited regularly in order to maintain relevance and maximise its value to the State.

Thank you again for providing the opportunity to comment in the draft.

Yours sincerely

Kerry Sanderson
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