



Submission by the
Housing Industry Association

On the

**Western Australian Draft
Sustainability Strategy**

February 2003

26 February 2003

Professor Peter Newman
Director, Sustainability Policy Unit
Policy Office
Department of Premier and Cabinet
15th Floor, 197 St George's Terrace
PERTH WA 6000.

Dear Peter

HIA Submission –

Focus on the Future: Opportunities for Sustainability in Western Australia

Thank you for the opportunity to comment on the draft report.

The Housing Industry Association (HIA) supports the State Government's commitment to mainstreaming sustainability. However, we have a number of concerns with aspects of the proposed approach and the proposed actions. HIA's concerns are outlined in the following pages.

On behalf of HIA, I urge you to seriously consider the changes that HIA has suggested and I look forward to dialogue with you on the changes. I would be delighted to discuss any of these with you should you wish to contact me.

Yours sincerely,
HOUSING INDUSTRY ASSOCIATION

John Dastlik
Executive Director
WA/Asia Region

Attach.

Housing Industry Association (HIA)

Response to Draft Report

Overview

HIA's submission:

- Supports the Foundation Principles and Goals of the proposed State Strategy ('the draft report').
- Has major reservations with the non-inclusive or limited nature for industry and community of the Proposed Actions.

In terms of housing, research has showed that it is 'how' people use their houses that has a major impact on living sustainably, yet this area has not received sufficient focus in the draft report. The State Government could play a significant leadership role in encouraging people to adopt more sustainable practices such as using their houses much more sustainably.

- Has major reservations at the 'Government' focus of the regulation and legislation rather than voluntary measures such as partnering.

The draft report is an action list for Government dictating to industry rather than a strategy for partnering with industry and community. This goes against the fundamental culture of sustainability process.

In general, the report tends to adopt a narrow view of industry which excludes industries such as HIA.

The draft report is not inclusionary of the housing industry and of its voluntary measures towards a more sustainable housing sector through its HIA GreenSmart programme and its affordable housing policies.

- HIA has grave concerns that the Proposed Actions will add another layer onto an already complex system of planning assessment:

The present system of advice/concurrence and referrals from government agencies and local government into planning decisions already causes costly delays for proponents, and the proposed 'dual' approach to the assessment processes for 'major' projects and (presumably) all other/non-major projects is not supported as it lacks transparency and adds complexity.

General

A State Sustainability Strategy needs to be inclusive of all parties and embrace the efforts of industry, the community, and individual effort in addition to that of government agencies.

The Housing Industry Association's previous submission supported the State Government decision to have a sustainability strategy but asked that the voluntary efforts of the Housing Industry Association towards sustainability be recognised and incorporated.

Disappointingly, HIA's measures have not been incorporated or sufficiently acknowledged in the draft strategy.

The draft report's focus is on government action rather than giving serious consideration to a strategy that also embraces existing industry actions such as, HIA's GreenSmart programme which has been acknowledged recently by the Australian Building Energy Council as industry best practice in education in energy efficiency greenhouse gas abatement and ESD for the building and construction industry was established under an agreement of the Ministerial Council on Greenhouse in the late 1990's as one part of a dual approach to controlling greenhouse gas emissions in the housing sector.

To reduce greenhouse gas emissions in the housing sector change is required in three areas:

1. Detailed research into embodied energy alternatives of construction materials;
2. Better planning of both residential subdivisions and design and construction of housing to provide housing choices for all income levels and stages of the life cycle; and;
3. A public education campaign to engage home occupiers and owners in operating their homes more sustainably.

The comprehensive HIA GreenSmart programme focuses on educating industry participants in how to design and construct environmentally friendly residential estates and houses and on raising the level of knowledge of industry to embrace environmental measures into their everyday business practices in order to reduce greenhouse gas emissions. The State Sustainability Strategy should incorporate such efforts into a cohesive strategy.

In last four years since the launch into WA of the HIA GreenSmart programme by the Minister for the Environment, the State Government has done little to educate the public to seek green housing, it has not provided adequate rebate systems to home owners/occupiers and it has not undertaken any research into embodied energy.

HIA for example regularly refers consumers to the SEDO help line. However good the efforts of SEDO are in providing information to consumers their budget is inadequate to reach out to the broad population.

The rebates offered for solar hot water service installation by the WA State Government are significantly less than those offered in Victoria, NSW and Queensland until this month there has been no system of rebates for water-saving devices, despite HIA's many deputations to the Water Corporation.

General Recommendations

HIA would like a cost impact analysis undertaken of the measures recommended in the draft report prior to final adoption of the State Sustainability Strategy.

HIA seeks assurance from the State Government that the Proposed Actions and Strategies contained in a State Sustainability Strategy would not add to the cost or length of time taken to obtain development approvals.

HIA recommends a single development assessment system for all land use applications in the interests of transparency and accountability.

HIA recommends that the final State Sustainability Strategy incorporate the many actions being undertaken by industry and communities in sustainability.

HIA requests inclusion into a specific partnership with the State Government for WA's housing sector and seeks recognition by the State Government for its GreenSmart programme

HIA recommends that the State Government has a comprehensive budget item to educate home occupiers on how to use their homes sustainably.

HIA suggests that the State Sustainability Strategy is be managed by the urban and regional planning and infrastructure system, with a new coordinating unit for all other aspects of the strategy that is centrally housed in the Premier's Office.

HIA recommends that a new central research and development team is established in the Department of Housing and Works to undertake sustainable housing research. The directions for the team should be overseen by a steering committee comprising representatives of industry, community and governments.

Detailed Response to Draft Report by Chapter

2 The Conceptual Basis: Developing a Framework for Sustainability

Sustainability Principles and Visions

Process Principles (p28)

The Process Principles should be reworded so that they are inclusive of all participants and not just Government.

A fundamental flaw in the draft report is its preoccupation with Government ‘control’ and a corresponding exclusion of the philosophical approach of government, industry and community working together as ‘equal partners’ to achieve sustainability. While partnering, roundtables and similar approaches are mentioned in the draft report, these concepts do not flow through to many of the actions. Hence, if the Process Principles were reworded to recognise this philosophical approach the subsequent actions would likewise embrace this.

Sustainability Goals and Priority Issues for Government

Goals (p31)

The Goals should be reworded so that they are equally inclusive of all. The use of words such as ‘we’ and ‘our’ referred to in Goals 1 -3 juxtapositioned against the ‘plan’, ‘support communities’ and ‘assist business’ mentioned in goals 4 – 6 indicate an ‘us’ and ‘them’ approach, which goes against a sustainable future for Western Australia. The Goals should be reworded to be equally inclusive of all.

3 Sustainability and Governance

While it is accepted that government at state and local levels has a leadership in governance role, it is 'how' this occurs that is important with the transition to sustainability.

Chapter 3 perpetuates the old paradigm or 'top down' approach. What is required to take Western Australia forward is a fundamental change in the way governance occurs – to embrace business and community as well as state and local government early in policy setting, determining actions, implementation in monitoring and evaluation of programmes and actions.

Accordingly, Chapter 3 and the strategy's relevant principles, visions, goals and areas of action should be reworded to embrace such inclusionary methods.

HIA as the leading industry association for the State's housing design and construction would like to assist in rewriting this chapter and participate with state agencies and local government early in setting the sustainability agenda particularly with regard to the planning system, which is of central relevance to housing and HIA.

With regard to the development of regional sustainability strategies (p35 etc refers) the role of HIA in guiding subdivision and housing for regional and remote areas and different climatic zones is particularly relevant. HIA would like to be included in formulating appropriate housing strategies for the State's regions:

- HIA plays a leadership role in housing which is an important contributor to regional development;
- HIA members design and constructs 90% of the State's housing;
- HIA members rely on HIA as their primary source of information on training – hence HIA provides government with a proven 'conduit' to industry participants and their clients.

Sustainability Assessment (p36>)

The two issues are:

1. The need for an integrated sustainability management system:

A flaw in the arrangements proposed (page 38 refers) is the lack of coordination between the three strands suggested for sustainability assessment. Rather than having three agencies each responsible for individual assessments, there is a need for an integrated approach. The role of the planning and infrastructure portfolio (WAPC and DPI) in coordinating sustainability assessments is broader than that of social assessments under the TPD Act and that this portfolio could provide the required integrated function. The position of WALIS as an integrating tool in the transition towards sustainability also requires consideration.

2. A Single Assessment System:

Under a sustainability framework there is a need to integrate the approvals processes applicable to major projects and that which applies to all other or non-major projects.

Major projects such as the Gorgan proposal on Barrow Island, do not include a statutory process for community or local government consultation and hence do not address social or other local issues off-site such as waste disposal etc in a manner familiar to local communities. Communities already find the planning system complex and confusing – the dual approach suggested by the draft report will exacerbate the eroding of community confidence.

The cumulative impact of all projects should be addressed under a State Sustainability Strategy. It is the cumulative impact of major projects (eg the resource projects on the Burrup Peninsula and Barrow Island) that create impacts beyond the boundaries of the projects, such as access and community impacts on nearby towns.

HIA recommends that industry should be included in the transitional arrangements. Table 3 (p39) for example, could be expanded to include the roles of industry bodies in formulating plans programs, policies.

Early inclusion of industry would achieve:

- Equality of input by parties ie, industry bodies, government agencies, local government, community) of each others position
- A collaborative approach rather than a top down approach to decision-making ;
- Greater acceptance of policy changes; and
- Would assist in the preparation of the proposed sustainability code of practice.

While mention is made of some industry initiatives towards sustainability in this chapter, disappointingly this does not follow through to the Vision, Objectives or Proposed Actions for governance.

It is recommended that the final strategy include formal Government recognition of industry's leadership role by suitably adding to the Vision, Objectives, and Proposed Actions of the vital roles played by industry.

Institutional Change (p 42)

Proposed Actions 1.3 and 1.4

The State Government's capacity building proposals are supported. However, the recommendations made by HIA in this submission should be added to the list of actions.

Embracing Sustainability in Government Agencies (p 45>)

The measures suggested in this section are supported. As indicated elsewhere in the draft report, industry (and community) has played a major role in sustainability and bringing government activities up to a similar standard is welcomed.

Partnerships for Action (p 51>)

The focus on this part of the draft report is on State - Local Government partnership. However, HIA recommends a broader approach through the engagement of industry in the proposed state-local Partnership (and the transitional roundtable) is recommended.

HIA as the peak industry body for the housing sector adopts a proactive approach to sustainability as highlighted in the association's submission to the draft sustainability strategy (April 2002) and formally requests inclusion in the Partnership in those areas relevant to its roles in the housing sector.

HIA recommends that the use of the word 'industry' is clarified as including all industry (bodies) from all sectors of the economy. For example, the land development, building and construction industry associations are not mentioned in the Chapter despite the importance of these sectors to social fabric and economic prospects of the State.

It is recommended that partnerships of state and local government, industry, community and academic interests are established for each sector of the economy. The terms of reference of such partnerships should be defined by all involved. This would be a more efficient, targeted and effective approach towards sustainability that the broad ones suggested.

HIA recommends that the WASIG group be given the responsibility to establish and operate these partnerships so that accountable, objective policy and auditing functions are established for government by a collective of industry, community and government.

HIA recommends far greater recognition be given to the integrating role of the state's planning agency. The report does not give sufficient weight to the role played (or possible for the future) of planning.

HIA recommends that the Premier, through the State Sustainability Strategy, elevate the status of the Minister for Planning and Infrastructure and her agencies within government (Cabinet, budget allocation, primacy of legislation) as a cornerstone for the achievement of sustainability outcomes for Western Australia.

While charged with a major role, the portfolio is poorly resourced. A higher profile is needed in the community and government of the role played by planning.

An example of the need to better resource and utilise the planning portfolio is in the lack of government focus on WALIS. The role of WALIS is acknowledged in the draft report but the final report should propose a larger more urgent role for WALIS.

The proposal (pp 55, 56) that a larger role should be played through the use of State Planning Policies is supported by HIA. The use of more SPP's would encourage a more consistent policy and process approach while allowing place-based solutions to planning matters and a 'sense of place' for local communities.

However, A significant impediment to this proposal is the mechanism for including Statements of Planning Policies (SPP's) into Local Government Town Planning Scheme's (TPS's). SPP's are only introduced into TPS's when schemes are being reviewed. The Town Planning Scheme review process is protracted, costly and cumbersome with the result that it can take years for SPP's to be included in TPS's and have the force of law in those areas.

HIA recommends that the legislation be amended to fast track the inclusion of SPP's into local government Town Planning Schemes.

Planning for Sustainability (p 55 >)

While acknowledgement of past and current policies and actions undertaken by the State's planning portfolio is welcomed, the proposals regarding the widespread use of Statements of Planning Policy require further examination.

Proposed Actions 1.12 to 1.15

HIA recommends that an additional Forum is held with all stakeholders to discuss mechanisms to 'build in' sustainability to planning practice. The November 2002 Forum was poorly attended and there have been no outcomes published from that event. However, the published findings could be used as a starting point for another, more inclusive and fruitful Forum. The proposed consolidation of the planning legislation for example which has been on the table for the last few years, could provide an opportunity for integration of sustainability into planning.

HIA is concerned that the draft report proposes to add another layer into an already complex system. Discussion with stakeholders and broad consultation on other options should be undertaken before committing to a single approach. As outlined elsewhere, it can take local governments many years to introduce Statements of Planning Policy into their Town Planning Schemes resulting in an uneven distribution of the take up rate of the new policies.

It would be useful for the proposed State Local Government Roundtable to be segmented along economic sectors. As it is proposed, the scope of the Roundtable is far too general so much so that it could be highly ineffective.

HIA recommends that a specific Roundtable is established focusing on the land development and housing sector. Proponents are a legitimate part of these sectors and should be party to issues that affect their performance.

Research and Development for Sustainability (P 66>)

HIA supports research and development within the housing sector to improve the sustainability of the construction of houses and operation of houses and recommends that the final report adds such a proposition to its Proposed Action List (p 69).

Housing is a fundamental social, economic, and environmental driver for sustainability in Western Australia. A research and development focus on the housing sector inclusive of HIA, would significantly contribute to sustainable future by, improving the environmental quality of this building form and educating the community in living sustainable (a 'bottom-up' approach).

Proposed Actions 1.25 to 1.28

These actions should be expanded so that the determination/discussion etc of these priorities and partnerships should also include agencies, industries and the community.

Consultation and cooperation of all relevant parties in ‘each’ area of sustainability should guide where possible by consensus of all involved to ensure that research and development expenditure is directed towards the priorities of all stakeholders, and not just scientists.

Recognising Sustainability Excellence (p 73 >)

Proposed Action 1.30

The proposed Annual Sustainability Award is supported.

5 Sustainable Use of Natural Resources

Sustainable Mining and Petroleum Production

It flies in the face of sustainability to have two systems of development assessment for land use in the State, as suggested in the part of this chapter related to mining.

Western Australia should have a single system of development assessment. The assessment of major projects (such as Gorgon) and the use of State Agreements/ Agreement Acts, even after the Keating proposals, are not subject to an understood level of assessment by the community. The Government should integrate the major project assessment process with that of 'non-major' development assessment processes. This will enable all parties a better understanding of the processes and greater input into decision-making on major and other projects affecting the community and regions.

Sustainability Coastal and Marine Environments

Proposed Action 3.50

The recommendations of the Coastal Planning and Management Ministerial Taskforce are supported Actions Underway, (p125), and should be carried forward in addition to the Proposed Action 3.50 – development of State Coastal and State Marine Strategies. In time, these two strategies should be combined into an overarching approach.

6 Sustainability and Settlements

Managing Urban and Regional Growth

Actions Underway (p 135>)

The Actions Underway are well known to HIA and are supported.

Strategies (p 135)

The Strategies need to consult broadly with industry on the strategies will be a necessary aspect of their successful implementation.

A key factor for the success of the strategies is the need to ensure that housing affordability is maintained/enhanced by an appropriate balance with environmental considerations. This is particularly relevant in the southern corridors of Perth given the high water table and the need to make best use of existing infrastructure such as the rail network.

There are value-laden statements made throughout the draft report about 'urban sprawl'. Rather than a blanket judgement the strategy should examine the State's investment in major physical infrastructure (in particular rail), the historic settlement pattern for Perth as valid inputs into any suggestions regarding sustainable growth.

The report for example, should focus on the self-sustainable nature of the corridors and the sub-regional centres and as in Liveable Neighbourhoods suggest a series of urban 'villages'.

The use of WALIS as a tool in the sustainability agenda should be included under 4.4.

HIA advises that through its GreenSmart program it has supported the expansion and mandating of Liveable Neighbourhoods community code so that there are more environmental considerations at subdivision stages and so that there is a single system of subdivision and development assessment at state level.

Proposed Actions

Proposed Actions, 4.7 to 4.12 are supported, subject to inclusion of the above comments.

Preserving Air Quality (p 146 >)

Proposed Actions

Proposed Actions 4.34 to 4.40 are supported.

Reducing and Managing Waste (p 148>)

HIA GreenSmart's Waste Reduction Project is a key action now underway through a grant from the Waste Management and Recycling Fund to reduce construction and demolition waste in Western Australia's housing sector. The avoidance, reduction and reuse of construction and demolition waste should be a priority for the Waste Management Board.

Construction and demolition waste is estimated to be over 50% of the waste going to landfill sites. The HIAGreenSmart Waste Management project is an existing study to research, develop a housing sector code of practice and educate the sector in waste avoidance and reduction. Reduction of construction waste on housing sites is collectively a major issue, which has been largely ignored by governments. The benefits of cleaner construction sites include less material going to landfill, increased recycling opportunities, training and education of trades, safer workplaces. There are also educational spinoffs - local governments could embrace it as an opportunity to educate new home owners on the benefits of cleaner sites.

An issue with waste grants distributed under the Waste Management and Recycling Trust Fund from monies collected as landfill levies since the mid-1990's has been the lack of accountability – of monitoring of recipients and the lack of a strategic, targeted focus. In the future, the Waste Management Board should develop priorities and strategies to target waste reduction by each sector of the State's economy, and advise industry and community members of its strategic directions on a periodic basis.

Hence HIA recommends additional Proposed Actions to capture the points made in the preceding paragraphs.

Our Water Future (p 151 >)

As part of the State's Sustainability Strategy, HIA recommends that the Water Corporation becomes a GreenSmart Partner. There are enormous benefits for the Corporation in joining the industry association in this endeavour. HIA is the main source of advice and training for its members, who construct 90% of the State's housing; in turn, home owners generally rely on their builders for advice on water saving features; HIAGreenSmart is supported by its members; and by working together, the Water Corporation could expand its message and could avoid wasting valuable resources on duplication of effort.

Proposed Actions

HIA recommends that the Proposed Actions list should be expanded to include actions regarding:

- Water Corporation become an HIAGreenSmart Partner;
- Greywater reuse options should researched by the Water and Rivers Commission and Water Corporation in consultation with industry and local governments and should be undertaken at the subdivision level, in preference to the household level for health and economic reasons. In this regard the work being undertaken by Sydney Water in Rouse Hill should be considered as a blueprint;
- The partnership outlined in 4.55 should include industry.

Sustainable Energy (p 154>)

Objectives

To achieve the Objectives for this area of sustainability, there is a need for considerable more assistance from the State Government in the form of significant increases in the rebates offered to

the community. The rebates offered by the Government should match or exceed those offered in other States.

Actions Underway

In terms of actions underway, HIA has concerns with Western Power's policy of insisting on underground power at the time of subdivision. In rural and remote localities it is cost prohibitive to developments particularly when they involve a small number of lots, and such is not sustainable.

Strategies for Sustainability

The move to using renewable energy sources for domestic energy consumption is a priority for HIA GreenSmart and hence is generally supported as a key action under the Sustainability Strategy.

Proposed Actions

4.59 & 4.60 parts of these strategies have already been put in place.

The State Government announced the adoption of the Building Code of Australia's Energy Efficiency Provision, effective on 1 July 2003, which requires a standard to a four star energy rating under the FirstRate system. The BCA provisions are mandatory on all new housing works in Australia. That is, the provision is mandatory for new house construction and for additions/extensions to housing.

With regard to extra incentives, the recommended strategies should be for the State Government to partner with HIA on its GreenSmart program to increase the take-up of additional measures by builders.

HIA seeks inclusion at an early stage in the Guide to Sustainable Planning, Building and Construction, as it has demonstrated its leadership in these fields in the last 4 years under its GreenSmart program.

4.61 The strategy as worded does not make sense, so it should be reworded. In addition, the suggestions in this measure are nonsensical. The proposal that Town planning Schemes should provide guidance on re-orientation principles as part of renovation approvals is not supported. It is inappropriate and shows a lack of understanding of approvals systems.

As outlined in our response to 4.59 and 4.60, renovations are already included in the BCA amendment re energy efficiency (to a four star energy rating equivalent under the FirstRate modeling system). Rather than using individual TP Schemes, it is preferable as mentioned elsewhere in the draft report to introduce standard measures under Statements of Planning Policy, which are State Government managed policies and provide a consistent approach across the State.

4.62 Supported, last year HIA wrote to the KeyStart board asking for the introduction of a GreenSmart environmental loan program and remains interested in assisting with the introduction of such a proposal.

- 4.71** This cluster of strategies requires clarification. The first, ‘household energy conservation information programs’ does not go far enough. The last proposal ‘using sustainability assessment to include life-cycle analyses on all such decisions’ is far too vague and in its present form is unacceptable.

Greenhouse gas emissions from inefficient use of energy by home occupiers is a key target area for improvement under the Strategy. The State’s funding to SEDO should be considerably expanded so that it can provide more information to the public and undertake more research and undertake monitoring into effective household energy reduction initiatives.

Building Sustainably (p 160 >)

HIA supports the preamble text and Boxes for this part of the Chapter.

Objective

The Objective should be expanded to state:

“Encourage the widespread adoption of sustainable building and construction through promotion and training of industry and encouraging the uptake of such practices from the public.”

Proposed Actions

- 4.78** This recommendation should be expanded to include the requirement for all housing to achieve a four-star energy rating at the point of sale.

As discussed previously, this action is implicit in the BCA energy efficiency amendment which becomes mandatory for housing (including extensions) in July 2003.

- 4.79** The recommendation to develop a Guideline should be revised so that it includes HIA participation in its formulation.

Any such Guide should recognise and incorporate existing guides such as the “Your Home” Technical Manual (Environment Australia).

- 4.80** This recommendation should be reworded to include existing actions underway by HIA’s GreenSmart programme, the Australian Building Codes Board drafts on sustainable building and other such existing actions. There is a need to avoid duplication of effort and to send a single, clear message to all stakeholders regarding sustainable design and construction of housing, commercial and industrial buildings.

- 4.81** This recommendation should be expanded. The incentives for sustainable building and construction offered by the State Government are too small and are ineffective. HIA seeks discussion with Government on additional assistance to industry to promote sustainable practices.

7 Sustainability and Community

Housing and Sustainability (p 171>)

HIA's role in increasing awareness and in training industry in sustainable housing through its GreenSmart programme is acknowledged. However, HIA's programme, while highly effective in training for industry needs to be supported by the State Government in two areas: research and education of consumers. Without a market demand for 'green' housing and without research to make the business case for builders to make the transition, HIA's programme is made more difficult. Hence HIA requests the State Government to include it in its Round Table and Partnership programmes and to continue to acknowledge and to expand its relationship with GreenSmart as has commenced with the Department of Housing and Works and LandCorp.

Proposed Actions (p 173>)

5.9 & 5.10

HIA supports an expanded role for research to demonstrate the benefits of adopting sustainable housing to the public and industry.

Housing research provided by AHURI should play a role in research into mainstream housing not merely social housing. Research into housing issues generally would be more effective if Government partnered with HIA to determine research priorities for all housing not just social housing.

8 Sustainability and Business

Training and Facilitation for Sustainability (p 198>)

The draft report omits to give recognition to the considerable training that industry provides. HIA for example, is a National Training Organisation and as part of its service to members, provides a wide range of targeted courses for those engaged in the housing sector as well as more general courses to the public.

Surveys have shown that building industry participants place more trust in the training and advice provided by HIA so that the Government should include recommendations to incorporate industry training into its sustainability strategy.

Self-certification is another option that is not addressed in the draft report. Rather than rely upon training provided solely by the and this level of trust should be TAFE providers the Sustainability strategy should also include provision for empowering individuals to embrace sustainability through their own codes of conduct.

The draft report would benefit from recognising existing training arrangements and the range of providers and its recommendations should be broadened accordingly.

Proposed Actions

- 6.1.1** HIA seeks further discussion on the proposal for a Centre for Sustainability. Any such centre should incorporate existing industry training providers such as HIA.
- 6.2** As a delivery agent for 'green' building courses, HIA requests inclusion on the Green Jobs initiative.
- 6.3** Likewise, the annual 'vision' event should be a partnering event with all parties (such as HIA) that currently deliver such courses.
- 6.5.1** HIA provides the leadership suggested in this action and seeks continued recognition by Government and inclusion in future structures.

Indicators and Targets

The proposed indicator is too narrowly focused. It should be inclusive of other training providers such as HIA.

Eco-efficiency & Industrial Ecology (p 204>)

HIA is a signatory to the WA Sustainable Industry Group and believes that it is the best example in the State of a cooperative venture between industry, community groups and governments. It should be a cornerstone of the Sustainability Strategy. The importance of the stature, magnitude and nature of the cooperative group has not been adequately portrayed or fully recognised in the draft report.

Proposed Actions

Accordingly, HIA seeks additional Proposed Actions to recommend the State Government provides adequate funding to the WA Sustainable Industry Group. The ability of such a diverse group to lead the agenda should be embraced by Government in its efforts to take the sustainability agenda (processes and actions) forward.

With the addition of the above action, HIA supports the Proposed Actions 6.10 to 6.16.

Industry Sustainability Covenants

Proposed Action

6.17 Broadly speaking, HIA supports this proposal, subject to our inclusion in formulating the covenant for the housing sector.

The issue of monitoring compliance however, is of concern and any final recommendation should give clear guidance on how the covenants would be managed. Too often policies are made that recommend actions such as this without the capacity or perhaps the will by Government and others to maintain such arrangements.