Focus on the Future

The Western Australian State Sustainability Strategy

Consultation Draft

Submission to the Western Australian Government from

The Institution of Engineers, Australia

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Introduction

This submission is in response to an invitation by the Department of Premier and Cabinet for comments on the Draft *Western Australian State Sustainability Strategy, A Focus on the Future*. The Institution of Engineers, Australia (the Institution) is pleased to provide comments which are directed at helping the Government in its efforts to establish sustainable practice within the State.

In 1992, the Rio Earth Summit highlighted the need for the world to make significant changes to its development philosophy and embrace sustainability. In the recent Rio +10 Summit in Johannesberg awareness was raised that much work still needed to be done to realise the goodwill contained within the *Agenda 21* principles developed at the first summit.

The Institution congratulates the Government of Western Australian on embarking in this important process of tackling this very difficult subject. The ideas and concepts described in the Strategy are visionary and the whole-of-government approach described is a mark for success. WA should look at itself with pride as it spearheads the States approach to sustainability.

Engineering Role

Engineers have a major role to play in supplementing and educating the public and private sectors on policies and practices that lead to sustainability. Recognising this critical role that engineers play, the Institution has introduced a number of programs to ensure that engineers are aware of the principles of sustainability. One of the ten tenets of the engineering code of ethics obligates engineers to take all reasonable steps to inform themselves, their clients and employer and the community of the social and environmental consequences of their actions and projects which they are involved in. Sustainability was introduced into the Institution as a policy in 1994 and the modern engineering graduate is exposed to the need for thinking in a sustainable framework.

At the Consultation Paper phase, our submission highlighted a number of initiatives that were introduced within the Institution. A significant initiative mentioned in the paper was the establishment of three taskforces to address Sustainability in Transport; Building and Construction Sector for Commercial Buildings; and Energy Practices.

The Strategy is largely compatible with the Institution's Sustainable Engineering Practices and therefore the Institution has showed interest and support for the concepts. Our WA chapter of the Environmental Engineering Society has invited Professor P. Newman on two occasions over the past year to present the status of the State Sustainability Strategy and has shown an interest in promoting this important initiative amongst its members. It embodies many of the principles that the Institution and the Environmental Engineering Society have sought to apply to environmental engineering and enlarges these in order to apply and implement sustainable practices in all aspects of the future development and functioning of the State of WA.

The following two sections provide comments and suggestions for consideration in the finalisation of the Strategy.

Comments on the Strategy

Actions should be prioritised

The Institution recommends that the actions listed in the Strategy be prioritised. The Strategy presents 249 actions for implementation over the next five to ten years. However, it is noted that some of the actions have to be implemented before others can be carried out. For example, the establishment of Sustainability Assessment (action 1.1) is considered a critical action that sets the way for sustainable planning and development across the State and should be considered a high priority.

Definition of Significant Projects—Summary Section (page 9)

The Strategy states that 'Sustainability Assessment will be undertaken on significant projects, plans, policies and programs ….'. A definition will be needed for what constitutes a 'significant' project. It would appear that under the current definition of a project, the State Budget would also have to be subject to a Sustainability Assessment. This may or may not be the intention of the Strategy but this definition could potentially cause repercussions on the Machinery of Government. Serious consideration needs to be given to what will be assessed for sustainability.

Buffer Zones—Planning (page 10)

In addressing the need for planning and regional applications of sustainability, the development of buffer zones should more fully integrate social and environmental objectives. The current situation has practical difficulties due to the neglect of the social factors in their framing. As a result many industrial buffer zones are very contentious with local communities and fail to realise their potential in addressing conflicting land uses.

Greenhouse and Mining and Petroleum Production (page 11)

It is critical that WA engages internationally so that it can gain credit for the high resource and energy efficiencies of many resources processing industries. Despite the energy intensive nature of many of the resource and mineral processing industries, WA is a world leader in the development of low emitting and high efficiency processing industries. If Australia refuses to ratify the Kyoto Protocol then the potential international benefits of our knowledge and performance may not be realised.

Water and Energy (page 13)

Sustainable pricing systems are needed for water and energy, that is policies and pricing structures that reward those who conserve and penalise those who use these resources excessively. Use of energy and water for non-essential lifestyle enhancement (i.e. home swimming pools, air conditioning systems, elaborate water features in home gardens etc) should require higher cost for those who choose this path.

Sustainability and business, Financial and economic instruments (page 14)

The Institution agrees that the inappropriate use of subsidies and Government support may distort the market and encourage unsustainable practices, so unless there is clear evidence that this distortion will be minimised, the use of subsidies should be avoided.

The Conceptual Basis—Character of the strategy (page 25)

In the discussion of integration of social with economic and environmental agendas, the importance of social sciences, humanities and business are extolled. This is appropriate and should be extended to the field of communications and media where many of the present styles of addressing environmental and sustainability issues and controversies often tend to

accentuate conflicts rather then focus on the agreement. While Assessment reports focus on balancing the three tiers of sustainability together, the media tend to focus on specific issue, especially if they cause division.

In a sustainable world, communication needs to seek to build consensus and shared values, rather than build upon fear and ignorance to create attention-grabbing and sensational stories. There is need for Government to show leadership by presenting strong responses to misinformation, where this is the case.

Foundation Principles (page 28)
In addressing the need for equity and human rights a conundrum exists that makes these principles seem somewhat hollow. That is the lack of any constitutional enshrinement of human rights in Australia. This may represent an impediment to the achievement of true equity and thus sustainability in Australia. Recent actions at the margins that threaten human rights make the need to incorporate the inclusion of individual and human rights in our constitution (as is the case in USA) an even greater need. Such moves at the state level include the potential for detention without charge or trial, mandatory detention of exiles and those fleeing human rights abuses in other countries who seek refuge in WA, mandatory sentencing for certain criminal convictions, and removal of the right to silence in police interrogations.

Sustainability and Governance (page 35)
In specifically addressing the recognition of the rights of indigenous Australians, which is just and proper to do, the issues of the rights of all Australians and other minorities is not addressed. As stated above (refer Foundation Principles) the signs of emerging erosion at the margin of human rights are noted. This reinforces the need for all Australians and legitimate guests to be afforded constitutionally guaranteed human rights.

Sustainability Assessment (page 43)
The concept of Sustainability Assessment is discussed and appears to be an important action out of the Strategy.

It is noted that the environmental assessment process inherently targets the protection of the environment after concepts and plans have been devised, just prior to development, when development approvals are required. The Sustainability Assessment process however, targets development at the planning stage. The Strategy suggests that assessment will be done through separate units with the Department of Planning and Infrastructure (DPI), Department of Environmental Protection (DEP) and the Department of Treasury and Finance (DTF). It will be critical to have an integrated approach to the assessment, especially when dealing with the expectations of timely advice/feedback to the private sector and industry. Practical and efficient integration arrangements need to be put in place so that there isn't any unnecessary bureaucratic impediments to the assessment process.

One means of attaining integration may be to establish the Assessment Unit within the Office of Major Projects. The Assessment Unit will be responsible for coordinating the overall assessment process by liaising with each of the Sustainability units within the three departments described in the Strategy (DPI, DEP and the DTF).

Because sustainability covers the business of almost every department and its scope is wider than just development projects, one approach would be to establish an 'Office of

Sustainability' within the Department of Premier and Cabinet, that include a Policy Section and an Assessment Section (see figure below). The Policy Section would guide and advise the various Government Departments on the implementation of sustainability as well as the development of Sustainability Reporting while the Assessment arm would coordinate the assessment process for projects from the DPI, DEP and the DTF.

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        │   Policy Section    │    │   Assessment Section    │
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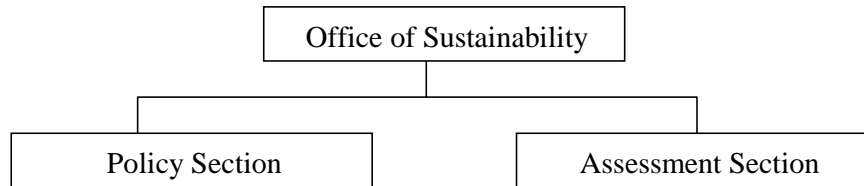
Strategic Alliance for Sustainability (Action 1.14)
The 'Strategic Alliance for Sustainability' is mentioned in this action item. However, this term was not observed or defined in the discussion leading up to the statement within the action and therefore would need to be elaborated on.

Resources for Sustainability Policy Unit
The Strategy indicates that the Sustainability Policy Unit will provide advice and guidance to the various Governments on sustainability policy and practice, it will establish and provide guidance on the Sustainability Code of Practice and assist with the development of Sustainability Action Plans for the various Departments. This level of service would necessitate the establishment of a significant resource pool. The resource requirements of the unit plus the need for other resources within the various Departments are not fully discussed. This type of information would provide Government and Educational Institutions with an indication of the future skill base required to implement the Strategy.

Local Government Implementation (Action 1.12)
Local Government should be involved in assisting the State Government in implementation of the Strategy as they are at the 'grass roots' level of dealing with local issues. However, care should be exercised in delegating the implementation so that Local Government is not lumped with significant responsibility and activities without sufficient resources and finances to implement them.

Guidance for Small Business (page 39)
Little guidance is provided for small business within the Strategy. Government should develop a short document or series of booklets on sustainability for small business. The purpose of this document would be to look at how small business can contribute to sustainable development through provision of examples and teaching small business how to carry out simplistic sustainability assessments on their own business.

Complex planning decisions (page 39)
Citizen juries and other novel means of incorporating public input to planning decisions are raised. These may be useful tools but it should be noted that in many or most cases communities will lack the necessary skills to fully engage with such processes, so capacity building on the part of Government and planning agencies would often be needed and substantial resourcing will be necessary.

Legislation (page 40)

There is a need to consider sustainability of all new legislation even where it may not have an obvious social or environmental effect. An example of this is the Federal Government's so-called 'Pacific Solution' legislation to deal with refugee resettlement and assessment. This could be considered just about anything but sustainable in either of its social or environmental aspects. Good authority sources note that the countries accepting to participate with the Australian Government in this process face many dire social and environmental problems as a result of their participation.

Institutional Change—Code of Practice (page 42)

The developing of a Sustainability Code of Practice and Resource Guide is noted. This is to be applauded. The WA Government should note and take account of the Institution's guide to Sustainability for Engineers, 'Towards Sustainable Engineering Practice' developed in 1997. This may serve as a useful example and template of a working guide to sustainability in practice.

Code of Practice—contractor agreements (pages 45 – 47)

The Code of Practice will serve as a focal point for sustainability within Government. This coupled with the Sustainability Procurement Process should be used as a basis of influencing the private sectors sustainable practices. The Code of Practice should include a section specifically targeted at the expectations or practices of contractors working for Government. This can be used by Government to set contract conditions on supplier behaviour.

Ensuring agencies' activities are sustainable (page 47)

It is essential that present institutional impediments to more sustainable performance in schools and other Government institutions be removed. At present the Education Department pays for the energy used in air conditioning systems in those state schools where parents can afford to purchase the systems, but will not pay to have insulation and energy conserving equipment or alterations effected. This perpetuates the ongoing use of energy when energy conserving measures could have been alternatively employed. This is not considered sustainable.

Partnership's for Action (page 52)

In the discussion of Regional Councils, there are existing examples of the successful use of this model in New Zealand, which appear to have not been considered in the Strategy. These councils are much more comprehensive in scope and application than the WA Waste Councils and should be considered as a working model for emulation.

Planning for Sustainability (page 55)

Because planning will be the key mechanism for ensuring sustainability in the State development, Institution agrees that the DPI should have a key role to play in implementing the Strategy from a planning viewpoint.

In addition, the Statement of Planning Policy appears to be a readily available and useful policy mechanism to embed sustainable consideration with the planning framework. However, the usefulness of this tool is not fully realised due to its advisory nature. To gain fuller benefits Statement of Planning Policies should be codified in statutory schemes and regulations so they have more than just an advisory status.

Global Opportunities (page 57)

The potential marketability of professionals, both planning and other, will be enhanced by the successful application of sustainable development framework and models in WA. This will benefit all the professionals involved. The prominent role of engineers in guiding and giving practical effect to sustainability outcomes needs greater acknowledgment.

Sustainability Awards (page 73)

In the interest of providing acknowledgment for initiatives in sustainability at different scales, the Institution recommends that awards for Sustainability Achievement be established at two levels—for both large and small scale initiatives. In having only one scale of awards, there is the potential for excluding small business and industry from contributing to sustainability.

Renewable Technology (page 91)

The Institution believes that Government should be investigating the opportunity of using hybrid vehicle for its fleet, when it becomes economical. Currently, Toyota produces a hybrid car that is well within the reach of the average income earner.

In addition to this, the Government should also be promoting research into renewable technology for powering farming equipment, as one means of supporting sustainable farming practice.

Sustainable Mining and Petroleum Production (page 113)

The efforts of WA mining and resources industries in affirmative actions to seek greater indigenous community participation are groundbreaking and possibly among the world's best practices. This deserves support and recognition. Equally the benchmark performance of much of the state's processing industry on emissions reduction and energy efficient processing is world-class and should be given due recognition. Examples are the highly efficient and low emitting alumina and natural gas industries, both of which have world leading examples in WA.

Public Transport—Investigation of Reducing Greenhouse Gas Emissions

The distribution of public transport should be equitable. While patronage and reducing the extent of private vehicle use are important factors, Government should ensure that those who are unable to afford private vehicles are able to easily access some form of public transport.

There is a need for Government to promote greater use of the rail system. The Perth rail system is a highly effective means of transportation and is of a very high quality. The Government should investigate pricing strategies to increase patronage. There needs to be significant savings in cost and time for patrons to adopt the train system.

In the eastern states, it is typical for multi-riders to be based on duration rather than the number of rides (for example, valid for one month rather than 40 rides). This promotes increased use of public transport as opposed to private vehicles.

The current system of 40 rides in a multi-rider (say) allows the passenger to use their multirider when it best suites them. When the passenger is travelling to the city for instance, they make a decision about whether to use public transport or their private vehicle based on which of the two is more convenient. In a large number of situations, they will choose a private vehicle.

However, if a passenger purchases a multirider that is valid for one month rather than 40 rides, they feel obliged to maximise the use of public transport within that month, to ensure they receive their money's worth. A trip that would otherwise have been taken by private vehicle may instead be taken by public transport. This is one means of increasing patronage on our rail system.

Preserving Air Quality (page 146)

Sustainable use of resources would suggest that only where monitoring or other means of measurement indicates that an air quality problem exists should there be a significant allocation of resources to reduce and manage industrial emissions. At the present there are worrying signs emerging that simply the suspicion or perception of air quality effects is enough to require the costly allocation of reduction measures, contrary to benefit-cost guidance. The State Government should display leadership and insist on rational allocation of limited improvement funds.

The reporting of air quality issues in the popular media is often done in a way that exaggerates the true impacts and gives undue credence to alarmist and often poorly informed views. It fails to balance this adversarial view with the evidence of the agencies and specialists with detailed familiarity of such issues, in preference to the more visible and publicity-seeking activists. This tendency needs to be resisted by Government.

Typographical Errors and Simple Corrections

Pg 19, paragraph 4, 'Finally, the ~~the~~ main….'.

Pg 22, last sentence on the last paragraph, '…short-term gains that did <u>not</u> take into account…'

Pg. 32 Table 1, column 3 mentions the 'Gini' index for wealth distribution, but this is not defined in the document.

Pg 38, paragraph 3, line 2, '..plan, ~~policy,~~ policy or…'.

Pg 61, second last paragraph, main sentence (before dot points) – formatting.

Pg 67, Box 13, first sentence '…jointly funded ~~projects~~ water ….'.