

Leschenault Catchment Council Inc.

A Partnership working towards a healthy, productive and sustainable catchment
ABN 55847 961 699

Sustainability Policy Unit
Department of the Premier and Cabinet
197 St Georges Terrace
PERTH, WA 6000

Dear Sir/ Madam,

RE: THE WESTERN AUSTRALIAN STATE SUSTAINABILITY STRATEGY

Thank you for referring the above strategy to the Leschenault Catchment Council (LCC) for comment. The document has been reviewed and LCC wishes to express its in principle support for the initiative taken by the state government to develop such a sustainability strategy and is in general agreement with the intention of the recommendations made. However, the following comments have been noted for your consideration.

Regional Sustainability Strategies

The strategy promotes a strong focus on the development of Regional Sustainability Strategies and contains a number of recommendations that are designed to increase the implementation of water conservation measures in a manner that is consistent with meeting the goals of sustainability. However, a major shortcoming of this strategy is that it fails to recognise and address the environmental issues and associated effect that the diversion of water to the Perth metropolitan area from regional catchment areas has. In fact, the Premier announced the diversion of water from Wellington Dam before the findings of the State Water Symposium were released which is indicative of a government that is more concerned with addressing the constituents rather than sustainability. The true environmental costs in diverting these waters has not adequately been addressed and it is not sustainable for water to continue being diverted into the metropolitan area to continue to support and "top up" a City which is clearly not operating sustainably in regards to its water use.

The unsustainable practice of developing new water resources outside of the Perth metropolitan region that permits further expansion of low-density residential areas in Perth is strongly opposed and does not reflect the 'regional focus' to which the strategy refers and promotes. The need to identify new water sources, as eluded to in the document, would not have the same urgency if water was not being seconded to support the Perth metropolitan area.

LWCC is in agreement that integrated resource planning is vital in identifying sustainable alternatives for water conservation initiatives, however the strategy fails to make mention of State land use planning legislation which has a significant role to play in minimising urban water consumption. State planning legislation does not encourage water conservation principles, current R code zonings, block sizes, subdivision designs and the continual push for urban sprawl, which results in vast amounts of reticulated lawn in areas of public open space all encourage excessive water use, and does not set an appropriate standard for business, industry and general community to follow.

The development of Regional Sustainability Strategies can not be adequately addressed when the document has a focus on the transfer of regional resources to sustain the Perth Metropolitan area. LCC recommends that the document do more to address unsustainable land use planning decisions and practices within the metropolitan area before resources are extracted from the regions.

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Agriculture

While LWCC agrees that a shift in how landowners approach agriculture towards more sustainable practices and developing new industries, the strategy fails to address current problems such as salinity, poor farming practice, and declared pest flora and faunal species.

The proliferation of exotic weed species and encroachment of garden and agricultural plant species into remnant native bushland and aquatic systems poses a significant threat to the long-term sustainability of these areas due to their ability of many pest species to out-compete many endemic species.

The term “best practice” also needs to be clearly defined, and in some cases refined, with regard to the desired sustainable outcomes of the strategy. The State Government and its agencies need to take a leadership role in developing policy and subsequent Best Management Practices that can be adopted by industry and the community.

Protection of Aquatic Systems

The management of the States remaining wetland systems should be developed in the context of ecologically sustainable development consistent with the principles outlined in the *State Wetland Conservation Policy (1997)*, System 6, *Environmental Protection Policy (EPP)* and environmental best management practices.

The strategy describes a need for the identification of environmental values and designate environmental quality objectives and classification criteria for the protection of aquatic systems. This work has already been completed and has so for some time. A classification system developed by the Semenuik Research Group has already been developed and employed for the classification of wetlands on the Swan Coastal Plain. This classification has been adopted and actively applied in land use planning by the Water and Rivers Commission (WRC). Management objectives based on this classification system are described in the WRC Position Statement: Wetlands (2001), which is inclusive not only of wetlands, but of important river and estuarine systems. However, those wetlands not identified under EPP are not afforded any legislative protection. With an estimated 80% of ‘Conservation’ category wetlands on the Swan Coastal Plain already lost through development pressures, the need for legislative protection is required with some urgency. The formalisation of protection for ‘Conservation’ and ‘Resource Enhancement’ wetlands, and System 6 areas under the *Environmental Protection Act 1986*, and amendments to the *Waterways Conservation Act 1976*, including increased penalties, should also be addressed as a matter of urgency.

While the strategy acknowledges that the process has commenced to develop Environmental Protection Policies for aquatic systems, the destruction and decline of these conservation, community and scientific assets requires more urgency in regard to putting these protective mechanisms in place.

Triple Bottom Line

Professor Peter Newman, at the recent stakeholder seminar on the strategy, suggested that social and economic advisory bodies would be created to address those respective concerns much in the way that EPA addresses issues pertaining to the environment with regard to proposals. While LCC supports a trend towards integrated sustainability outcomes, the practicalities associated with the establishment (allocation of resources, funding) of these bodies has not been considered. This is reflective of many of the proposed objectives of the strategy.

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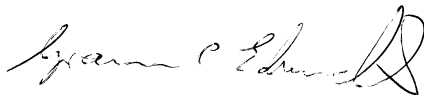
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While LCC recognise that an action plan and partnership agreements are to be prepared within the next 12 months, the Council would expect that agency responsibility and expected timeframes will be designated for specific actions. This is particularly prevalent considering the tenure of Professor Newman's involvement with the strategy is due to conclude after this 1-year period, leaving only a single person to administer the progression of the strategy. LCC recommends that appropriate resources be investigated and provided to maintain the current momentum and progress the objectives outlined under the strategy.

Should you have any further queries please contact Mike McKenna at the Water and Rivers Commission in Bunbury on (08) 9721 0666.

Yours sincerely,



Graeme Edwards
Chairman – Leschenault Catchment Council

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