

28 February 2003

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Dear Peter

SUBMISSION ON DRAFT SUSTAINABILITY STRATEGY

The Natural Resource Management (NRM) Council supports the concept of a State Sustainability Strategy, and congratulates the State Government and your Policy Unit in developing the draft document and in engaging the community in the debate on sustainability.

This submission will tend to concentrate on broader, high-level issues, comments and observations, and focus on the NRM area. The Council members belong to varying organisations, and many of these will be making detailed submissions in their own right through their organisation.

The comments made have been given a heading to enable the issue to be clearly identified and understood.

1. Pro-development orientation of Strategy

The Strategy appears to have been written from a development orientation, and this is reflected in the language used eg "use" of natural resources, "harvesting" of forests. Even the definition of sustainability talks about "simultaneous environmental, social and economic improvement" and seems to suggest man's dominance over the environment and his ability to successfully manipulate it. The document doesn't seem to genuinely reflect a concern for the natural environment.

Council suggests the language used in the Strategy be modified to reflect a genuine sentiment of sustainability, particularly in managing the natural environment.

2. Government emphasis in Strategy

The Strategy talks about what State Government and Government agencies will do, but does not widely address the role of other groups and organisations such as non-government organisations, (NGOs) community groups, etc. The Natural Resource Management Council is not mentioned and the Regional NRM Groups are not named fully, but are described as "the five natural resource management



regional organisations". You would be aware that an interim rangelands group (The Rangelands NRM Coordinating Group) has been established and is incorporated. Possibly a map showing the regions would be useful. Additionally, NGO's like the World Wide Fund for Nature (WWF), Greening Australia and Conservation Council are active and should be acknowledged. The document needs to engage a wider group of stakeholders in order for it to have any effect, and these should be explicitly mentioned.

3. Establishing a baseline for sustainability in WA

There does not appear to be any discussion or statement on a baseline for sustainability in WA, or a comparison to other countries or the world generally. The reader has no feel for whether we are faring well or poorly in managing our natural resources. Albeit the WWF Living Planet Report 2002 may have shortcomings in some assumptions, it at least attempts to establish baseline indices and criteria against which comparisons can be made and footprints compared. Some feeling of urgency could be generated if similar comparisons could be made in the Strategy to where we think we honestly should be with managing our natural resources. An audit of WA's sustainability status may be necessary as an early action in the implementation of the Strategy.

Thus Council recommends some baseline assessment of our sustainability status be performed.

4. Mechanisms for changing behaviour

The Strategy appears to have a focus on statutory means of ensuring compliance or enforcing sustainability. This aspect is certainly needed, but the other mechanisms of persuasion, education, incentives and self-regulation need to be pursued also. As a State Strategy, it would be wise to engage the community in implementation and mention their important role in the document. Sustainability is for everyone, and all need to be acknowledged, engaged and involved.

5. Institutional arrangements for implementation

The Strategy currently is a list of actions with no clear institutional structure apparent to take on the responsibilities for implementation and monitoring. Allocation of tasks to a group is necessary. These groups could be agencies, local government, community groups, service clubs, etc. It is recommended that existing structures be used rather than creating new ones. Peak groups could act as custodians or patrons to ensure work is performed effectively.

Council is also concerned as to how the actions will be fed into the community and how the established voluntary NRM community structure will be used. Members suggested that biting off small pieces at a local level for local implementation could be successful. It was also suggested that a good communication strategy be developed to advise community about the Strategy and their role in implementing it.



Council sees that the key points are that someone needs to be designated as responsible for each agreed action, and also that a reporting mechanism needs to be put in place to ensure implementation occurs.

6. Resources for implementation

Further to the above paragraph, where resources are required for an action, these should be identified and sought. Proposed actions without resources generally lead to nothing. NRM Council, and members involved in the previous Salinity Council, are conscious that an excellent strategy or plan is worthless unless there is commitment and resources to enable action to occur.

Council recommends some strategy on resourcing actions be included in the Sustainability Strategy.

7. Role of Local Government

There is a prominent role given to Local Government in the draft Strategy, and Council members' contact with local government and experience is that it is too ambitious and not completely aligned with the Western Australia Local Government Association's and local shires' thinking. In the NRM area, local government wants to be involved, and they should be. However, they want to be represented in regional NRM groups, but they do not want the process to depend on them. Local government representatives are not elected for their NRM expertise, and councillors tend to be pro-development. Several regional group representatives have had local government experience, but these members have grown beyond the roads, rubbish and rates mentality to want to conserve and preserve our environment and promote sustainability. There are members on the NRM Council (eg. Rex Edmondson and Barbara Morrell) that have served on local government but now are involved in regional, state and national NRM and sustainability issues.

Council recommends that further discussions be held with the Western Australian Local Government Association and the Regional NRM Chairs to determine what role local government would like to play, and can play, in regional NRM.

The following comments are more specific to the NRM situation.

8. Leadership

One of the key challenges for WA in achieving a sustainable future in NRM is to have a decision making structure which is proactive and consultative, yet decisive once the debate is had. The government/community/agency interface and relationship is growing, and cooperation is developing, but it can still be difficult at times.

It is not only agencies that provide leadership; community groups and others have influenced NRM direction greatly. Trust and cooperation is essential between these three key stakeholders. Political, community and agency leadership and courage is needed to set an effective NRM direction.



Council considers the Strategy needs to acknowledge the need for a positive interface and honest cooperation between government, community and agencies in the Strategy.

9. Sustainable agriculture and managing change

From an agricultural viewpoint, farming systems need to adjust dramatically to cope with climate change, natural resource management, sustainability, fluctuating markets, etc. Assistance will be required to make the radical changes; members felt funding for adjustment is needed but with rigorous conditions that promote sustainability attached.

Factors influencing sustainable agriculture are trending negatively; for example the prosperity and size of rural towns are decreasing and local employment is down. Rural people are more concerned about survival at this time.

Wind erosion and other agriculturally induced factors are impacting on biodiversity and causing loss in our natural diversity. Members felt this issue was not addressed well.

There is an opportunity to change the way land is managed through carbon credit agreements, but it is considered that this would be more influential if the Kyoto Agreement was signed by Australia.

Council believes there needs to be the economic incentives present to promote voluntary change to land uses that will move to sustainable practices. Research, development and extension on new deep rooted, commercial crops is necessary to tackle salinity and other issues.

Managing the necessary change in agriculture is also a challenge to educate the younger farmers. The average age of landholders is such that they are unlikely to make a major shift in their farming practices, and therefore there needs to be a focus on the younger, better-educated, farmer.

10. Environmental management systems

All food produced should be safe and of an acceptable quality. There is no direct reward for a farmer in broad acre farming in following an environmental management system. There are no market signals that indicate to farmers that it is worth pursuing accreditation. For some smaller commodities (eg milk, horticulture), there is an incentive but this market tends to be created by the middle man, not the consumer.

11. Recognition of Landcare, Rivercare, Bushcare and Coastcare

For many land managers, sustainability is a goal as it will mean their livelihood, their assets, their family and their community has a better chance of survival. The landcare movement and associated ethic has developed over the last ten to fifteen years and is strong in many areas. With the more recent development of rivercare and bushcare, this is now evolving into a NRM ethos with a strong sustainability



ethic. People are becoming aware of the concept of the "triple bottom line", and many have been subscribing to its principles without knowing it as such.

Regional NRM groups have developed over recent years, and now there are six NRM community based groups covering the State and working towards developing NRM strategies. The groups are at varying levels of maturity and the strategies at various levels of development.

Council believes the continued impact of these groups needs to be acknowledged and focussed in the Sustainability Strategy, and they need to be engaged in developing and implementing the Strategy.

12. Legislation in NRM

In a few years, it is envisaged that some integrating, over-arching form of NRM legislation will be developed. This legislation will link the existing Acts, and give some objectives for NRM. It will enable the creation or acknowledgment of community groups, and will give limited powers to enable groups and agencies to perform their NRM work effectively. This could be mentioned in the Strategy so open discussion can occur.

It is also worth noting that the Agriculture Management Bill is being reactivated and work is starting on a Biodiversity Conservation Act. Both are key pieces of legislation in natural resource management, and acknowledgment of WA's stance on NRM and this legislation's link to NRM should be incorporated in the Bills.

13. Framework for action

Several sections in the Strategy seem to need a State Strategy to provide a framework for the random actions listed in the section or actions omitted from the section. For example, the rangelands section talks about forming a rangelands committee of NRM Council to identify key issues, and then lists other specific actions. It may be better to prepare a strategic plan of soil types, possible uses, conservation areas, etc to guide decisions on what areas should be retained for pastoralism, conservation, other industries, etc.

The biodiversity section does recommend the development of a Biodiversity Conservation Strategy and the introduction of a new Biodiversity Conservation Act, and also raises specific actions. Ideally, there should be a framework within which the specific actions have been reviewed and prioritised. NRM Council and agencies, including CALM, are working on methodologies to prioritise assets for investment now.

14. Partnerships

The Strategy needs to acknowledge a relationship with NRM Council. Council has been charged by the Government to provide leadership in NRM and to give strategic policy advice to Ministers. Council sees that it is involved in the sustainability area, and is planning to develop a NRM vision and strategy.



Government also asked Council to develop a vision in its Government Response to the Salinity Taskforce report.

Council believes some mention of the NRM framework, the NRM Council and key NRM players needs to be mentioned, and some idea of roles and linkages given.

15. Rangelands

Council members believe the way we manage a large proportion of the rangelands does not appear to promote sustainability. There is doubt amongst members that the community has the capacity to use it and manage it sustainability. The size of the rangelands and its issues warrants more coverage in the Strategy.

The NRM Council is preparing a vision for the rangelands with a view to being prepared to see how the recommendations from the Ministerial committees fit this vision and to be ready to provide advice on what needs to be actioned to achieve sustainability.

16. Biodiversity

There is a large opportunity to work with the landholders on biodiversity in the South West region. The Government needs to look at ways of securing the key "jewels" still left in the area, particularly through partnerships with private philanthropic organisations. Communication and education on biodiversity importance is necessary.

17. Environmental Protection Policies

Some members have had experience with Environmental Protection Policies being used in addressing NRM issues and they have found them to be a relatively blunt instrument. In the case of the "Wetlands of the South West" policy, people needed to understand what the policy was trying to achieve. There needs to be communication and discussion as part of the implementation process for these policies.

I trust these comments are useful, and members are available to clarify or add to the brief comments made here.

Yours sincerely

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