

# **WETLANDS CONSERVATION SOCIETY (INC)**

2 January 2003

Professor Peter Newman  
Director, Sustainability Policy Unit,  
Dept of Premier and Cabinet  
147 St George's Tce  
Perth, WA 6000

Dear Professor Newman,

## **Draft State Sustainability Strategy**

Thank you for inviting us to comment on this draft strategy.

We are pleased that the WA Government has decided to develop such a strategy and we fully support the general content and direction of this report. The draft strategy is comprehensive and covers many vital issues. We will provide some general comments on the approach and then comment in detail on the wetland and water issues.

Firstly we have some general comments.

1. The Implementation Plan is not clear. Although the Strategy contains many useful goals and proposed actions they will not be implemented unless a clear and detailed implementation plan is developed. For example the most recent WA State of the Environment Report (1998) covered many similar issues to this draft strategy but no implementation plan was put in place and so most of their recommendations have not been followed through. A similar fate befell the 1992 WA State of the Environment Report. We recommend that you follow the process adopted for the Perth Air Quality Management Plan for which the strategy was followed by an Implementation Plan which assigned target dates and responsible agencies and set up an audit and review process for the Plan. A lot more work needs to be done on Chapter 9 if this Strategy is to be effective.
2. There is a lack of target dates and measures of success (or failure) for most of the proposed Actions. Each one of these Actions needs to have a set of measures or performance indicators and target dates associated with it as in the Implementation plan for the Perth AQMP.
3. The auditing process for the Implementation Plan needs to be carefully specified. We would like to see a State Sustainability Council established, containing a wide range of community expertise. The Council would be serviced by the Premier's Department and its job would be to monitor the implementation and updating of the Sustainability Strategy and to publish an annual report of its findings. This will obviously have resource implications but unless these resources are provided the Strategy is unlikely to be successful.

4. The draft Strategy does not have a section on environmental protection. Clearly the WA Environmental Protection Act is in urgent need of review to make it compatible with sustainability. There are also several features of the Act that do not work well at present, especially in regard to waste management and land use planning. Also the process for developing environmental protection policies is too cumbersome and appears to have broken down.
5. The sections on greenhouse and population are very disappointing. These are areas where the Government is refusing to face up to the hard questions. In both cases we need specific policies with targets and measures. We cannot simply go on ignoring these issues because they directly affect all of the other issues in the draft. Population and greenhouse are probably the most difficult issues to address because they affect everyone and to tackle them we need to make major lifestyle changes. This is something that no democratically elected Government likes to do. However to ignore these issues is untenable because they will undermine the Strategy itself. The lack of detailed policies on population and greenhouse is in stark contrast to the detail on other major issues.

Secondly the Wetlands Conservation Society wishes to submit its detailed comments on the wetland and water issues in the draft Strategy.

- a. In order to protect wetlands effectively we need an inventory of wetlands in WA and a database in which their characteristics, values and condition are recorded. This inventory has been promised by successive Governments for the past 20 years but the task has never been completed. Most of the information required to establish the database has been collected and only desk work is needed now to establish the inventory.
- b. We support Actions 3.36 and 3.37 but we would like you to specify how these goals could be achieved and what performance indicators and target dates are appropriate.
- c. We also support Action 3.38 but note that the EPA has failed to develop effective EPPs to protect wetlands and groundwater. The SW Agricultural Zone Wetlands EPP is a failure because only one wetland is listed. CALM refuses to list any of the publicly owned wetlands and the EPA is powerless to compel it to comply. The Swan Coastal Plain Lakes EPP expired four years ago and so far it has not been renewed. The Western Swamp Tortoise EPP has been discussed for the past nine years and still has not been completed. The situation is similar with groundwater EPPs and the EPA has made virtually no progress in the past five years in this area. In our experience wetlands and groundwater are much better protected by the WAPC through its Statements of Planning Policy, like those it has for the Jandakot Mound and the Peel-Harvey region. Unless the Environmental Protection Act is strengthened to give the EPA more authority in this area its EPPs will continue to have very little value.
- d. Action 3.39 is commendable and it relates to the wetlands inventory which we support but you should specify who will do this work and in what timeframe.
- e. Actions 3.40 – 3.42 are also worthwhile, although progress has been very slow on these issues and more outcomes are needed.
- f. We support Action 3.43 and it has been promised by all Governments for the past 15 years but nothing has been done. We need a much more specific statement and a measurable outcome and timeline if this action is to be taken seriously.

- g. At first glance Action 3.44 appears to conflict with Action 3.40. This needs to be carefully considered and more clearly articulated. In its present form we could not support 3.44.
- h. We also support Actions 4.5 and 4.6 although we note that more detail is needed on what will be done and in what timeframe.
- i. We strongly support 4.25 and recommend in addition that the Main Roads Department should be amalgamated with DPI immediately. As long as MRWA is independent of DPI we will not have integrated transport planning in WA. Why do road users need a separate department to deal with?
- j. We support Actions 4.52 – 4.58 but we would like to see a strong statement about identifying and protecting the State's water resources through appropriate legislation and managing them on a sustainable basis with adequate provision for environmental needs. We would also like to see specific references to the development and implementation of the State Water Conservation Strategy that was released for public comment in June last year. This Strategy holds the key to substantial decreases in per capita water consumption. Excessive water consumption is an issue that WA needs to face up to urgently and it should be a key element of the Sustainability Strategy.
- k. We are opposed to Action 6.12 because we believe that DEWCAP should be a regulator and not an advocate for industry. You should not mix these roles in a single department. We are already concerned about the mixing of DEWCAP's role in operating and regulating waste disposal facilities, such as Brookdale and Mt Walton. This misguided approach has caused many problems for the DEP and we would like to see these facilities operated by the Health Department and regulated by DEWCAP. We are not opposed to an Eco-Industries Section but we believe that it should be placed in the Department of Industry and Technology which is a support agency for industry.

We commend you on the work done so far in preparing this draft Strategy and we hope that you will consider our comments carefully and amend the draft accordingly.

Yours sincerely,

Philip Jennings  
President