

Mr Peter Newman
Director – Sustainability Policy Unit
Department of Premier and Cabinet
15th Floor Governor Stirling Towers
197 St Georges Terrace
PERTH WA 6000

Dear Peter

**Wheatbelt Development Commission Submission
State Sustainability Strategy**

The Wheatbelt Development Commission has the following comments and issues in response to the release of the Draft State Sustainability Strategy:

Sustainability is already considered core business of the Commission and sustainability elements are integrated into our current work practice. For example – The Commission is already a signatory to a cleaner production action plan and the Commission attempting to promote diversification of agriculture and work with Regional Catchment Councils to promote landscape scale change towards sustainable land uses. This strategy is not helpful in providing a way forward to addressing the Wheatbelt region's constraints towards achieving sustainability in the region.

This document appears to be a framework for a bureaucratic accountability system, with no framework for concrete, on ground actions. It seems to be a mechanism to facilitate government agencies to begin thinking in terms of sustainability.

The strategy also appears to be an exercise in cost shifting, as there are no financial incentives for any parties to undertake sustainable actions, especially Local Government.

‘Regional Sustainability Strategies’ and ‘Sense of Place’

The Commission already has a regional economic vision ‘*Shaping the Future*’ which essentially provides a framework for sustainable economic investment. The Commission is also working with regional Catchment Councils to develop Natural Resource Management plans for the region and works closely with the Department of Planning and Infrastructure (DPI) in developing other planning documents (such as the Avon Arc Regional planning strategy and the Central Coast Regional Strategy). It is timely however for ‘*Shaping the Future*’ to be revisited to embed more fully some of the strategies outlined in this document. The Commission would envisage this updated document, in conjunction with other existing strategies in the region, to be sufficient as a Regional Sustainability Strategy.

The Commission believes it is important for the region to establish what the regional priorities are in context of sustainability. The Wheatbelt region emphasis needs to be towards more complex economic and environmental solutions, as opposed to identifying the region's 'Sense of Place'.

The Commission considers that the Wheatbelt communities already have an identified 'Sense of Place' and have a good understanding of the region's social and community well being. As a result, the concept of 'Sense of Place' as highlighted in the Strategy, may be more appropriate to metropolitan regions. Furthermore, in response to the Commission being assigned to promote and facilitate 'Sense of Place' actions, the Commission is of the opinion that the proponents may have misunderstood the role of Regional Development Commissions.

In terms of the region's social environment, there are more important issues not addressed in this document, which affect the Wheatbelt region's social sustainability. More resources need to be invested into social aspects of the community, as opposed to investing all resources into economically sound projects. Examples include improved education and health facilities, better recreational facilities and the promotion of arts and culture. Investment into these services in the Wheatbelt is limited as the perception is that low population does not warrant this investment and cannot be justified in economic terms.

It is very difficult to attract investment to a region unless employers can offer employees a good quality of life. There have been examples in the Wheatbelt where towns cannot attract new business or business cannot attract quality professional employees because the quality of life is not considered appealing. Improving the social aspects of our communities will improve a region's ability to attract and retain more people and businesses, therefore enhancing the region's social and economic sustainability.

State Sustainability Policy Strategies

The Commission considers that the strategies highlighted are too generic. The Commission is already working to achieve a number of these actions. The policy does not address the constraints towards achieving these actions (i.e. assistance with how many to tackle the problem, funding solutions etc.) Furthermore, many of the indicators and targets are too vague and too easily attainable.

The Commission questions how many of these initiatives are going to be funded. This documents clearly outlines many of the issues without any substantial answers. If there was funding presently available in the region, significant progress could already have been achieved towards a number of the actions. Funding is one of the major constraints towards achieving sustainability in the Wheatbelt region.

The Sustainability Strategy talks about projects in parallel, i.e. Region of Councils, Development Commissions, Local Government's etc. all doing different things. It is important for this document to advocate that these case studies need to be done in collaboration rather than all undertaking their own individual projects.

Actions depend on the willingness of the people. It is necessary to increase peoples awareness of the issues – it is not possible or desirable to force people to be sustainable. To this end, this strategy does not define how DPC intends to tackle this issue.

Comments on Specific Actions:

Sustainable Agriculture

Given that Agriculture is one of Western Australia's major industries, the elements of this section are very weak. They are not innovative and there are no creative ways presented to suggest hoe to make the actions happen.

Furthermore, the suggested indicators and targets for agricultural actions will not necessarily appropriately measure agriculture sustainability. For example, agricultural businesses across the state have registered positive farm profit for a number of decades, but this has bot been an accurate representation of agricultural sustainability. It is also questioned how the extent of rural and regional infrastructure directly relates to improved agricultural sustainability. It is considered that many other factors, beyond agricultural sustainability, influence the extent of rural and regional infrastructure.

Whilst the strategy suggest these indicators are still undergoing development and testing, the strategy provides no concrete indicators to measure agricultural sustainability in the short term. The fact that this strategy has not provided answers and identified any clear targets indicates the strategy's vulnerability.

Global – Greenhouse

No mention of an increase in renewable energy for WA. Currently Western Power is required to produce 2% of its energy from renewable resources by 2010. If the State is serious about sustainability, surely greater emphasis on renewable power generation should be included in such a strategy.

Global – Oil Vulnerability

Where practicable, 100% or close to it, of the Government vehicle fleet should be on LPG, especially the Executive Vehicle Scheme vehicles. This would foster a cultural shift towards LPG being lead by the senior executives in Government. The current 25% requirement is largely seen as a impost which needs to be met, rather than a genuine commitment to reducing oil dependency, reducing LPG pump prices or reducing vehicle pollution.

Settlements – Growth Management

In strategy 4.4, the requirement to match land supply to the cost efficient provision of infrastructure may have a detrimental effect on land development in the Wheatbelt region. In the majority of cases, cost efficient provision of infrastructure does not occur, as it needs to be subsidised to allow land developments to take place.

Community – Health

Sustaining country health services by providing incentives to attract and retain medical practitioners does not provide a sustainable health service. What it provides is a health service that is underpinned by incentives that may or may not continue.

Business – Training

Need to provide training for existing workforce to facilitate changing attitudes towards sustainability.

Business – Economic Instruments

Required all recipients of Government grant funding to demonstrate project sustainability through the use of the Triple Bottom Line methodology.

For this document to be useful to the Wheatbelt Development Commission, it needs to advocate that agencies work in a collaborative way for better outcomes on the ground. The focus of the document should be about Government entities, both state and local, working together to achieve an outcome.

Yours sincerely

David Singe

CHIEF EXECUTIVE OFFICER
11th December 2002