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Dear Dr Gallop

This submission is in response to the recently published *Focus on the Future: the West Australian State Sustainability Strategy Consultation Draft.* My overall reaction to the consultation draft is one of disappointment, for the following reasons:

i) Typically, the supposed public consultation has been limited, with a short series of workshops, which were held during business hours allowing minimum attendance. Additionally, media coverage was limited and advertising minimalist. This is in accordance with the usual lip-service to the concept of 'public consultation' which does not desire, expect or allow for true public participation. For those community members dedicated enough to attend the work-shops, they are left as usual, with no clue as to if their input will be addressed or have any impact on decision-makers whatsoever. The shortfalls of the government-initiated workshops pushed the WA Collaboration to organize the successful State Sustainability Summit over the second weekend of February, for the benefit of community groups and affiliations. This should not have been necessary, the State Government if sincere in its supposed dedication to public consultation must renovate this process and actively seek the participation of the entire community, as well as demonstrating that their concerns have been heeded and had impact upon the final document. Most importantly, the Government must recognise the inaccessibility of this extensive and dense document to the majority of the community, who lead busy and eventful lives. It would therefore be more conducive to community participation to have community form the strategy based on their hopes and dreams for the future, leaving it to government agencies to somehow pull these together into a coherent strategy with elaborate negotiation and democratic process.

ii) As an active community member I have concerns that my energy as an environmental activist, full-time student, friend, daughter, sister and part-time worker is being sapped by having constantly to write lengthy submissions, similar to this one, outlining my concerns and criticizing ineffectual document after document. This, as an aspect of my life, is unsustainable. Your disappointing consultation draft adds insult to the injury of my concerns; this document is *not* a sustainability strategy but a polite nod to the status quo of current paradigms while proposing incremental changes, however I shall delve deeper into its deficits in greater detail below.

iii) The point is that if the drafters of documents such as this (which you so glibly sign your name to) were to do their job properly, myself and other community members like me would not have to dedicate so much time basically doing their jobs for them with the unsatisfactory return of little feedback and a sense of the insensitivity to the voices of community.

iv) As I mentioned above, your proposed sustainability strategy is anything but and I fear may simply be a response to the latest fashion of the buzz-word, 'sustainability'. Although the strategy certainly aims to ensure the sustainability of industry and its interests, it is contemptuous of the interests of community (particularly those of Indigenous Australians) and the environment. It does not challenge the current paradigm of development and in no way proposes seriously to take action on systems and processes that promote injustice, exploitation, inequality and environmental devastation. Certainly, if we were living sustainably or truly desired to do so there would be no need for 'sustainability' as a concept, because it would be our way of life. In this manner, there is no need for an 'androcentric, economic rationalism strategy' because this sensibility dictates our current mode of living.

iv) The language used extensively and throughout the entirety of the document is vague, passive and does not imply commitment or dedication to the realization of its aims and goals. Language found in the *Proposed actions* sections, such as 'encourage', 'promote', 'support' and 'enable' are tacked onto initiatives that do not declare the intent to alter legislation or require drastic and immediate change. This I believe allows the government lee-way in implementing real action and provides projects at which to throw money that are ineffectual and lightweight.

v) The State Government repeatedly proclaims throughout the document the success of the Draft Forest Management Plan and that logging in old growth forests has ceased. This is a blatant untruth which only appears to be correct due to tricky re-defining of concepts and governmental deception. The fact is that clear-felling is still taking place in the old-growth forests of the south-west.

Although the above are my primary and overarching criticisms of the State Sustainability Strategy document, I have also specific criticisms pertaining to each chapter and subsequent sections of the document, which I will briefly (due to time constraints) outline below.

**2. The conceptual basis: developing a framework for sustainability**

- *Foundation principles- p28*
  The statements headed by 'Biodiversity and ecological integrity' are certainly not currently being recognized by government in its devastation of old growth forest, proposed degradation of Burrup Peninsula and Ningaloo Reef and lack of firm stance on genetic engineering.

- Box 5, p 29 – no indication is given of how this is going to be achieved.

- *Governance- p30*
  Where is the evidence to support these claims? The government's lack of commitment to Kyoto? In its support for war on Iraq, against popular opinion?

**3. Sustainability and governance**

- p35- last paragraph, skeptical
  Is this reflected by the government's current treatment of Swan Valley Nyoongars?

- p36- 2nd last para, last line
  The use of economic terminology here is indicative of the lack of true commitment to sustainability and a paradigm shift.

  last para- public *engagement* only? Demonstrates the transparency of governmental dedication to public consultation.

- Box 7- Hamersley Iron's Sustainability Assessment Process. This is a paradox! Mining is inherently an unsustainable practice and can achieve no environmental benefit and only shallow, short-term social benefit. This assertion of 'sustainable' mining is also found on p52, expressed as a partnership for action with petroleum production. Certainly, these two industries have a long history of partnership, each supporting the other out of mutual economic interest. The paradox can again be found on p58 under the heading, *Sustainability in the Regions.*

- p38- mentions the EPA as appropriate for environmental assessment. This seems to ignore recent controversy regarding the power of the EPA, in environmental disasters such as those experienced at Brookdale and Bellevue.

p42 *Institutional change*- IS THAT IT?

p45 *Embracing Sustainability in govt agencies*

Perth Zoo dealing with symptoms of mass species extinction is essentially unsustainable

CALM quote: 'most (?!) Departmental locations recycling'? 'Most' is certainly not good enough, as an example to the wider community or as demonstrative of environmental commitment.

- p53 *In short..Objectives*

No. 1- These interests currently work against civil society and so any resultant and final State Sustainability Strategy will certainly be biased toward goals of industry with the usual support of local government and the conflicted impartiality of commissioned research organizations

p55 *Planning for sustainability*

EMRC quote- misleading, the EMRC promote mass urban development such as that planned for the Eastern Corridor.

p61 *Indig. Communities and Sustainability*

This entire section is an offensive, racist and insensitive display of the government's lack of commitment, respect and understanding for Indigenous Australians. Paragraph 3 of this page is outrageous and suggests that 'industry's development proposals and security for Aboriginal people's cultural heritage and values must be equally respected within the overall development of the State'.

This paragraph is representative of the attitude displayed in the remainder of this section and the entire consultation draft. The State Government shows contempt for the inalienable rights of Aboriginal people to Australian land, land which they have occupied and managed sustainably for at least 40 000 years. Land on which their ancestors have lived and died on and with which they have an intrinsic connection. The State Government maintains their scorn of Indigenous Australians by consistently refusing to apologise for the genocide experienced by their ancestors and so is derisive of the Reconciliation movement.

Last para. 'New and just relationship between Govt WA and Ab. West Australians'
scope?
commitment?

p62 last bullet point of 1st para.
The proposal to employ Indigenous people in the rape of their own land is sick and highly offensive

2nd lot of bullet points
How about facilitating healing and trusting the capabilities of Indigenous people to order and deal in their own affairs?

These are all programs and are not changing the paradigm

- institutional racism etc

Last 3 paragraphs are diabolical
: 'social probs. due to lack of employment because of lack of edn. and training'
how about cultural loss?
impact of continued invasion and forced cohabitation with descendents of those who committed genocide on their people?
identity loss?

p66 *Research and Development for sustainability*
Box 12 – biodiversity research?- stop destroying their habitats etc

p68 Box 13. This CALM initiative is typical of CALMs commitment to bad land management and complicity with the interests of development. As usual, the root of the problem is not dealt with (in this case, salinity) and a destructive technique is used under the banner of 'best practice'.

**4. Contributing to Global Sustainability**

- Why isn't there a chapter on consumption?
- p76 economic devt critical to stabilizing global popns?

- *In short…*
  What about relationship between capitalism, consumption and environmental degradation?

- The responses to WA's international biodiversity obligations have been occurring for some time….? How can this possibly be true? The south-west region of WA has been identified as one of the few biodiversity hotspots in the world and the State government has not wavered from its mission to desecrate this area.

- p81 2nd lot of bullet points, 2nd bullet point
  only 11 wetlands nominated? In the whole of WA?

- p82 token mention of Indig. Involvement. Why don't we instead try to learn from Indigenous people a way to live in harmony with our environment?

p86 *Responding to Greenhouse and Climate Change*
what about halting deforestation? And committing to Kyoto?

**5. Sustainable use of natural resources**

- p95 *Sustainable agriculture*
  Guiding principles far too vague

- Box 23 p100
  But what is sustainable agriculture? What does it look like?

- *In short continued*…. p101
  How about overhaul of EPA altogether?
  More independence for body etc

- p102 what *are* the 'best management practices'?

- The paradigm of agriculture that currently exists in WA and around the world is not challenged, monoculture crop farming that has resulted in land degradation, soil erosion, massive land-clearing and subsequent salinity; and the over-use of pesticides has not been over-turned in favour of sustainable practices.

p 103 *Sustainable Fisheries and Aquaculture*

How about addressing overfishing as a *global* environmental issue?

Para 4. Sustainable levels presently? On what grounds are they classified as sustainable? Especially if 'fully exploited'?

p108 *Sustainable forestry and Plantations*

The Draft FMP does not promote sustainable forestry.

Plantations- monocultures and the inherent problems of lack of biodiversity.

*Sustainable mining and petroleum production* p111

A paradox!

Para 2 - rehabilitation post-mining? Not possible, healthy bush once cleared cannot be rehabilitated. No-one can profess to claim intimate knowledge of an eco-system or habitat.

- 2nd last para. Passing the buck onto consumption. Typical

- 1st para. p113. not a comparable tradeoff

  3rd para. Aborginal training programs- atrocious.

- *In short*… industries to set sustainability standards? Suspect

p 115 *Sustainable Tourism*

- Urban sprawl in Hills?
- End to logging?
- Ningaloo?

How does the government propose to promote tourism of areas that they have exploited?

- p116 para 2. Indigenous interests acknowledgement not enough

*Protecting Aquatic systems*

GLOBAL WARMING- a reflection of our lifestyles, primary industry, agriculture, mining and land clearing. These practices must be halted.

- p119, para 3
  'poorly understood by the general community and undervalued as a consequence'! How about govt mismanagement- logging in catchments, mining etc?

- *In short…*
  Degradation and decreasing quality well acknowledged but does the response match the gravity of the problem?

- p120, bullet point 4
  How about protecting all wetlands entirely?

- *Proposed actions*
  3.4 , but logging in catchments- as in hills continues to occur.
  And what about urban developments?

*Sustainable coastal and marine environments*

- 'representative' para 5, p123. Who decides what is 'representative' and why don't the public have input into whether they believe that this is enough?
- 'sensible coastal devt' para 6. The proposed marina and development at Maud's Landing could not possibly be considered sensible for the reasons given by various environmental organizations, TWS in particular.

*Sustainable rangelands management*

- What about the State's stance on GM, monoculture (traditional) agriculture?
- Last para; 'out of how many leases altogether saved for conservation?
- Box 27. no paradigm change though
- No mention of insecticides, organic, permaculture, GE?
- Last para: and? Response to these challenges? Feral animals etc

**6. Sustainability and settlements**

*Managing urban and rural growth*

- Growth? Must be redefined
  Surely it is the conventional form of economic growth that causes the disparity in the first place

  Economic growth is not the answer, at least not under the present global model, the first world is not the ideal model

  Sprawl must be curtailed

  East Perth/Subi Centro etc are not sustainable developments! Perpetuate disparities, inequitable, elitist etc

*Revitalising declining centres and suburbs*

- 'regenerate' Midland? This plan actively displaces local Indigenous people from their meeting place at Toohey Gardens and leaves them with nowhere acceptable to gather. This scheme had the potential for effective and creative partnerships and instead acts like further invasion to an already dispossessed people

*Integrating land use and balanced transport*

- State government projects, para 4. Not sustainable development, more like sustaining development.

*Preserving air quality*

- How about CALMs burnoffs?
- p 146 Why are the economic implications even considered? We have a right to clean air.

*Reducing and managing waste*

- Bellevue para 3, what about the cover-ups/corruption/denial etc Brookdale
- We don't even have recycling in the CBD
- *Voluntary* is not enough para 3 p149

*Our water future*

- Still logging in catchments
- *Proposed actions* weak and tokenistic, 4.57- only 20% in 10 yrs
- *Indicators and targets*, cant we do better than this?

*Sustainable energy*

- Developing 'voluntary' schemes is a waste of time

*Building sustainably*

- Stop this thirst for new developments, who cares if the home is sustainable if they had to clear an acre of bush to build it!

**7. Sustainability and community**

*Housing and sustainability*

- Urban sprawl
- Ecovillages- for the rich?, can only the rich afford to live environmentally sensitively?

*Sustaining healthy communities*

- Indig. Health?
- p177 para 4, must be holistic- linked to reconciliation, anti racism in all spheres
- p 178: first point of action underway is ridiculous

*Education and community awareness for sustainability*

- *Actions underway,* no1 – not enough!
  no 4- 1 school? This is not an action!
- grey water!
  recycling!
  compost
  veg. gardens!

*Sustainability thro' culture and the arts*

- 1st para, p185- how does this fit into Burrup/Uluru/Jabiluka etc
- Box 37 'lead to a more sustainable timber industry' how?
- Para 4, p187, Burrup rock art protected- how will this occur with the proposed exploitation of the region?

*Multiculturalism and sustainability*

- Anti racism legislation not mentioned: remove racist bias, our society is mainstream
- p191 point 4 – government must say SORRY
- refugees?
  ATSIC?

Native Title?

**8. Sustainability and business**

- Ford Motor Co. quote: does not change consumption/development paradigm
- P196, key4 ‘consumer culture’ does not strive to alter
- Key 6- free markets are inherently and fundamentally inevitable and exploitative

*Financial reform and economic instruments for sustainability*

- GDP?
- Need to be far more extensive eg eliminating subsidies for mining/logging/roads/industry etc

**9. Implementation**

- Why isn’t legislation and institutional change a whole section?!!

I trust that you will take the concerns and queries outlined above to heart and pursue a more effective and promising strategy based on better process and true community consultation.

Yours sincerely,

Zoe Moore