SUMMARY AND RESPONSE TO PUBLIC SUBMISSIONS ON THE DRAFT STATE SUSTAINABILITY STRATEGY
September 2003

Section Two – The conceptual basis: developing a framework for sustainability
Evolution of sustainability

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300089: Phil Thompson	4	The reference on page 22 (last para.) to the long time which will be required for the necessary change to be made to the world economy similarly applies at much more local levels.	Agreed through change usually starts at local levels.
200303443: State Development Portfolio	21	This section of the report (p.23) should correctly note that the Global Mining Initiative was a forum for the mining industry to develop its input for consideration at the World Summit on Sustainable Development. The Mining, Minerals and Sustainable Development project was a mechanism to facilitate industry and community consultation.	The Final State Sustainability Strategy has been changed to address this.

What sustainability means

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200302780: Brisbane City Council	3	The conceptual discussion, definition and principles are comprehensive. However, for practical application to policy and development assessment, the definition and principles need to give clear guidance for deciding between competing claims to sustainability, and should precede the setting of meaningful indicators.	Deciding between competing claims is a combination of new skills and tools which the Sustainability Policy Unit and Sustainability Roundtable will provide and political value judgement by Cabinet where advice will be prepared in a Sustainability Framework.
	6	We suggest defining 'sustainability' as a relative concept which only makes sense in relation to a defined system ie. the sustainability of an action can only be determined by its effect on the integrity and persistence of a defined system. It can thus be seen as lying on a continuum between permanent loss and permanent preservation of a given set of social, environmental and economic values within a defined system. The values and system can be determined by a democratic and information-rich process. **(Provided a table to illustrate a suggested approach to a sustainability continuum.)**	Agreed. See paper on 'Response to Submissions on Sustainability concept.'
200305753: Department of Planning and Infrastructure	22	It is imperative that the definition represents a single philosophical basis that is widely accepted throughout the community	Agreed.
200300362 Wildflower Society of WA Inc.	4	Despite these positive statements, our Society believes the definition of sustainability given in the strategy is rather anthropogenic and should be amended to reflect the concepts of Ecologically Sustainable Development and natural cycles within whole ecosystems. The essence of sustainable development, as we see it, is that all organisms on the Earth need to have access to clean air and water and healthy land or other habitat to source their food and enjoy their lives. We, as caretakers, have a responsibility to ensure this is possible over the long-term.	This is to emphasise the ecological and not the integration with social and economic factors. The ecological perspective has its own place in government, The State Sustainability Strategy is trying to find the synergies and integration to other areas.

What sustainability means *continued*

200301547: City of Cockburn	4	Concern is expressed over the definition of sustainability given in the Strategy. "Sustainability is meeting the needs of current and future generations through simultaneous environmental, social and economic improvement". Simultaneous improvement in all three elements, while a visionary and commendable notion, would seem to be an unrealistic option in most circumstances. The main area of concern is that if a project is subject to a sustainability assessment and refined in light of this assessment, leading to an increased cost of implementation but with a better social and environmental outcome, is that project then no longer defined as 'sustainable' (i.e. reduced 'economic' outcome)? This could deter many organisations from undertaking the better outcome option if achieving 'sustainability' is considered out of reach.	See paper on 'Response to Submissions on Sustainability Concept'.
200300089: Phil Thompson	1	Definition of sustainability: I think this is a 'Clayton's' sustainability, leading to emphasis on the 'triple-bottom line' approach throughout the draft. The outcome will be an application of this approach to a wide range of matters, and this having been done, it being claimed that the results will be 'sustainable'. In fact, the draft acknowledges that there will often need to be 'balances' made between the triple-bottom line factors, and the result may well be one which is not really sustainable in the sense that it results in a condition which can be maintained in perpetuity. A new definition is needed which will mean real sustainability, and which could be related to the simple question being asked: "Can we keep going like this for as long as we want or will there come a point when it will no longer be possible?"	The emphasis on longevity is only part of the sustainability concept. Integrated TBL is the key way of solving long-term problems and not just doing short-term decisions.
200303268: Diane Matthews	1	Further to my submission on the original consultation paper on this topic in April 2002, I am pleased to note that the definition for 'sustainability' has been changed in this later document. However I still have some difficulty with the use of the word 'improvement' when applied to sustainable environmental management. While it may be necessary, in order to achieve sustainability, to improve on past management practices, it can be argued that past ill-advised 'improvement' to our natural systems is what has caused much of the present degradation!	Even wilderness needs to be 'improved' eg the Prince Regent wilderness area is being eaten out by donkeys. There is nowhere human impact cannot be improved. However, note new definition.
200302957: BHP Billiton	8	Review with key government agencies the other stakeholders whether the definition of sustainability in the draft strategy properly or practically reflects the integration between the different dimensions of the triple bottom line and the trade offs which occur to ensure a net aggregate benefit over the long term.	See paper on 'Response to Submissions on Sustainability Concept'.
200303169: Chevron Texaco	1, p. 3	Revert to the more commonly accepted term *Sustainable Development*, instead of 'sustainability', as this is more readily understood by key stakeholders.	See paper on 'Response to Submissions on Sustainability Concept.'

THE CONCEPTUAL BASIS: DEVELOPING A FRAMEWORK FOR SUSTAINABILITY

What sustainability means *continued*

200303169: Chevron Texaco	2, p. 3	Use the globally accepted World Business Council for Sustainable Development (WBCSD) definition of sustainable development ("…*forms of progress that meet the needs of the present without compromising the ability of future generations to meet their need.*") Again, this is more readily understood by key stakeholders and is more likely to provide a basis for reaching alignment amongst those stakeholders. This is particularly true for international industries such as resources and energy, which play such an important role in sustaining the State's growth.	See paper on 'Response to Submissions on Sustainability Concept.'
200304379: DEWCP	1, par 5-6	Interestingly, whilst the term 'sustainability' is mentioned early in the draft Strategy, it is hard to find the definition. Given that this term is integral to the Strategy, it is noted that it first appears on p 24. Hence, it is suggested that it instead be inserted in the Executive Summary near the start of the document (and be highlighted). Also, a note that the Government will be working to phase out <u>unsustainable</u> practices, including within its own operations, should be inserted early in the Sustainability Strategy.	The definition occurs at the start of the document in both the draft and final Strategies.
	7, par 4	Box: 3 Whilst this box certainly emphasises the urgency for these issues to be addressed, the urgency for freshwater quality issues in particular to be effectively addressed would become even more apparent if one were to also add sedimentation/turbidity, euthrophication, trace contamination and population growth pressures.	Hard to say as a dramatic dot point.
200215541: John McBain	P 1 par. 3 and 4	The triple bottom-line is a step forward, but the underlying importance of the environment must be acknowledged. Unfortunately, the triple bottom line of sustainability is a new concept that has limited real application in our society. The definition equates commercial, environmental and social factors, yet it is difficult to think of a government, commercial or private activity in our society where the 3 factors have equal weighting in decision-making.	All three must be acknowledged. This is the challenge of the State Sustainability Strategy.
200303443: State Development Portfolio	22	It is also suggested that the use of statistics quoted in Box 3 (p.24) be supported by the inclusion of appropriate referencing.	Reference to State of Environment Report added.

THE CONCEPTUAL BASIS: DEVELOPING A FRAMEWORK FOR SUSTAINABILITY

What sustainability means *continued*

200303350: Graeme Olsen	5, Pg. 15	The acceptance of a political definition of sustainability (page 24) leads to a number of difficulties with subsequent application of the concept. It soon becomes apparent that there is little objectivity in the way the concept is applied, because it embodies two different concepts: • the concept of continuing for a long time, and • the concept of desirable outcome. The difficulty with this intertwining of the two concepts is that it is not always clear which of the concepts is behind particular statements, and it is not clear whose concept of desirable outcome is being used. For topics where there may be differences of opinion on what constitutes a desirable outcome, there appears to be little or no discussion of the alternatives. This weakens the robustness of the document.	New definition may overcome this but the reality is that the concept does incorporate both ideas. It is in fact the genius of the concept as a way of bringing people together to try and resolve their differences.
200303494: WA Planning Commission	3.5	The Draft Strategy describes the evolution of approaches to sustainability and its effect on changing definitions. The current approach taken in the SPS is rather to seek a "balance". The proposed definition in the DSSS implies, for example, that an activity that provides both economic and social gains, but "trades-off" the environment is ultimately not sustainable. The difficulty in the planning system is that it is often impossible to simultaneously achieve sustainability objectives where these can work against each other. The scale at which the judgement is to be made can also be problematic.	See paper "Response to Submission on Sustainability concepts."

Character of the strategy

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200303048: Conservation Commission of WA	2, p. 4	The Commission recommends that the Final Sustainability Strategy should adopt the concept of 'strong sustainability', and that mechanisms for developing uncrossable baselines be outlined.	One person's 'strong' is another one's 'weak'. Eg you can make a 'strong' conclusion on the environmental and weak on social/economic and therefore not address sustainability.
200303343: State Development Portfolio	24	Whilst the short discussion makes mention of the background papers prepared on ethics and sustainability, the document would benefit from a description of the significant issues and challenges arising in this important area.	Ethical issues are part of the 42 sections discussed though many of the complex issues are better addressed in the background papers.
200303073: Natural Resource Management Council	Point 1	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.	Sustainability requires concern for all three factors.

A sustainability framework

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200302959: City of Fremantle	6	The City of Fremantle will have its own set of sustainability principles, visions and goals for its community following consultation, however, consistency will be an important factor to ensure that both the State Government and the City of Fremantle are progressing in the same direction. The identified State-Local Government Common Sustainability Framework which will be set in a partnership agreement, will certainly assist in this, but it must be supported with resources for a period of time as many councils do not have the staff to apply and progress sustainability.	Noted. Resourcing is an on-going issue of priority.
200302960: Urban Development Institute of Australia	10	As the land development industry representatives body, UDIA requests that the state government establish specific industry working groups to provide the level of focus and detail required. The purpose of the working groups will be to develop a common sustainability framework and revisit the objectives of sustainable development prior to the further progression of the draft strategy.	On-going work, especially between Minister for Planning and Infrastructure and UDIA has led to policy suggestions in the *Settlements* section. This work will be on-going.
200302961: South West Development Commission	5	Adopting the ethos of sustainability is fraught with practical difficulties that will need significant consultation, resourcing and commitment to achieve. Ensuring appropriate mechanisms for assessment and simultaneous integration of the triple bottom line will be vital to implementing this strategy.	Agreed. But it is worth trying.
200302780: Brisbane City Council	4	Hard political choices about policy and development cannot be resolved in practice without agreement about what is and isn't sustainable in principle…Simply integrating economic, social and environmental issues into decision making is a necessary but not significant condition to deliver sustainability.	See the Sustainability Framework.
200305753: Department of Planning and Infrastructure	23	The Final Strategy must have an 'operational focus' so that the general community, as well as decision makers in industry, government and elsewhere can see clearly and unambiguously the implications of implementing the principles.	Agreed.
200301547: City of Cockburn	5	The need for integration between the three elements of social, economic and environmental gains is noted. However, it is believed the 'triple bottom line' decision-making process of considering all three elements equally with minimal trade offs (as stated as one of the process principles) will lead to a wider community acceptance and ultimately more sustainable outcomes in a shorter time frame, rather than requiring improvement in all three elements.	Agreed. This is the sense in which integration is being considered.

A sustainability framework *continued*

200300089: Phil Thompson	6	Foundation Principle headed 'Settlement efficiency and quality of life'; this principle is supported, however how on earth is a city's ecological footprint going to be able to be reduced if its population continues to grow. In short, do not pretend that a city is being directed down the path of sustainability (eg. through incorporation of 'green' design features in new suburbs) if the strategic plan for that city involves continued population growth, especially on its edges.	Population is a global issue. No part of the world or and city can be fenced off and considered sustainable if the rest has to deal with all the problems.
	7	'Governance' vision: It would be great if our system of governance could be world famous in the manner described, however we have an awfully long way to go. Our government and most of its agencies still are locked into the mentality that 'growth is good' and to be sought after, and any sort of 'levelling out' (particularly in the economic area) is something to be viewed with concern and steps taken to put things on the rise again.	The visions in the final Strategy are meant to stretch us.
	8	'Settlements' vision: this vision should include mention that the settlements are not growing (but given 5. above, this would presently be inconceivable).	Noted.
200303069: Alcoa	2	We do not see that the draft Strategy forms a basis for balancing sustainable development with the environmental and social considerations in the future planning of Western Australia. In particular, the draft Strategy does not recognise the ongoing need for economic development in the heavy manufacturing and resource industry sectors to continue to support the resource-based economy that currently exists. It is critical to the future growth and prosperity of Western Australia that a robust economic strategy is developed in the draft Strategy in balance with the environmental and social strategies to form three, equal pillars for sustainable development. The framework for sustainability in the draft Strategy is outlined in a set of foundation and process principles. While these high-level principles provide an idealistic and somewhat academic vision of sustainability in Western Australia, it is difficult to see how they are connected to either the Australian or international agenda on sustainability, set by organisations of which Australia is a member country. Indeed, the draft Strategy appears in some key areas to run counter to the Australian position, including energy reform, greenhouse gas abatement policies, and economic development, which impacts on the competitiveness of our business and capital investment.	The final Strategy does include reference to economic policy and as indicated by the Box on HISmelt demonstrates Western Australia's leadership in sustainability in resources processing.
200303169: Chevron Texaco	3, p. 3	Focus initially on developing an agreed set of sustainable development principles in consultation with stakeholders. This step should come before, not concurrently with the promulgation of processes and actions to implement the draft Strategy.	The State Sustainability Strategy principles have had two years of consultation without significant change. The actions are the focus for most people.

A sustainability framework *continued*

200303169: Chevron Texaco	4, p. 3	Encourage each industry sector to develop their own specific sustainable development operating principles that participants in those industries can support. We are confident that key industries in WA such as the petroleum industry would respond positively to the opportunity to consult with the Government on the development of principles appropriate to the relevant industry.	Agreed. This is reflected in the final State Sustainability Strategy, see *Business*.
200303348: Conservation Council of WA	1, par 8	The draft strategy identifies as a principle of sustainability that: "public engagement lies at the heart of all sustainability principles". Yet, the draft strategy and the process of finalisation was **not** underpinned by the broad-based, participatory process. A truly participatory process would: • build ownership of the concept and practices of sustainability; • recognise that there are numerous 'communities' and 'publics' in Western Australia and build different engagement strategies for each of these 'publics', for example: the WA communities for whom sustainability is a strange and unknown idea; and the WA communities already largely informed about, and committed to, sustainability	Noted. Participation and engagement however was quite broad, though the Sustainability Roundtable will need to expand considerably on this.
200302948: Environmental Defenders Office	Page 4	The Draft Strategy refers to the precautionary principle as a "process principle" and therefore a principle which is integral to the implementation of sustainability. Careful consideration should be given to how to implement this principle, given the judicial treatment of this principle to date. **Examples follow illustrating that the precautionary principle will rarely affect the actual outcome of a decision.** … Given these cases, implementing the precautionary principle in any meaningful way in the future will require that the principle be given a resilient definition and paramountcy in legislation.	Agreed. Much more work needs to be done on how this principle can be applied. NOTE: the precautionary principle has been extended to social and economic areas as well as environmental.

A sustainability framework *continued*

200304162: Environmental Protection Authority	Page 7, para 3	***Strategy text:Box 5*** *In Australia, a similar situation applies with water use. In the past 10 to 15 years most Australian cities have reduced per capita water consumption, except Perth where this occurred in the previous decade. The consumption of water demonstrates that demand management has reduced the use of water at the same time as our economic health has improved.* **Comment** This is a curious statement. It is generally acknowledged that over the past 25 years water resource problems in WA, especially in the more populated South West, have become acute. *A list of water management issues follows and the EPA suggests these matters might be considered before the draft strategy is finalized. See original document for complete list of matters.*	The Statement is true. The water resource problems have occurred due to lack of rain not due to an unwillingness to change.
200303590: WA Collaboration	5, pg. 3	While the principles, visions and goals of the Sustainability Framework are commendable, the process for creating this framework would have ideally being a long term participatory process to develop a ***shared*** vision across Western Australia about what a just and sustainable future for Western Australia looks like.	It is a long term participatory process and the Sustainability Roundtable enables this.
200303494: WA Planning Commission	3.10	RE: Sustainability framework There is little or no recognition in the DSSS given to the SPS, or to the role that this currently plays as a statement of the government's intent with regard to achieving sustainable development outcomes. It is also not clear how far the proposed approach seeks to build on the existing SPS, or if the needs of the planning system have been taken into account when preparing the alternative approach. The process involved in amending the SPS, and then the consequent changes required to planning instruments is cumbersome and time consuming, requiring community input. This places a significant financial and administrative burden on the Commission and should not be embarked upon lightly. There has been no active dialogue entered into with the Commission to date on how best to manage such change.	The final State Sustainability Strategy does refer to the State Planning Strategy.
200303090: Woodside Energy	1, p.8	Woodside, in common with APPEA and other petroleum producers, believes that the principles of sustainability should be broadened to increase the emphasis on three key areas: Safety, Governance, Viability**. See document for details on each key area.**	See APEA response. Safety has been included in Principle 2, Governance is in Principle 9, and viability in Principle1.

200303590: WA Collaboration	Rec. 32	**Sustainability indicator systems** Establish sustainability indicator systems that are clear and accessible and that enable government and the community to gauge progress across the social, environmental and economic dimensions of sustainability. Establish the ongoing measurement, collation and reporting of the associated indicators and their implications, at least annually, to State Parliament and the broader community.	This is addressed in the final Strategy. See new section on "Measuring and reporting on sustainability". Reporting arrangements yet to be determined.
200303074: WA Sustainable Industry Group (WASIG.)	4, p.9	The WA Sustainable Industry Group is concerned about the practical value of the proposed framework. Most importantly the draft strategy (in the sense of the total package of proposed government initiatives) can meet the requirements of the State Government's own sustainability definition, whereas this is not the case for the vast majority of proposed government initiatives in their own right.	The framework sets the vision and actions begin to illustrate what can be done.
	4, p.10	*The WA SIG recommends that the foundation and process principles for sustainability in Western Australia be simplified, be presented as 'work in progress' and be illustrated with practical examples of how each principle will benefit individuals and communities in Western Australia.*	Not supported. The 11 principles have remained relatively unchanged. There would be little benefit in simplifying these.
	2, p.11	*The WA SIG recommends that the State Sustainability Strategy should provide for a strategic process that will generate an evolving set of a few priority areas that can be addressed consecutively. Progress in addressing those time-bound priorities generates learnings that should be utilised for selecting new priorities over time, in response to the evolving sustainability agenda. This strategic process should favour actions that have outstanding triple bottom line benefits and that are truly complementary and additional to initiatives already undertaken or planned by the public, private and non-governmental sectors. Such approach would enable resources to be prioritised to be able to make inroads for progressing sustainability in some areas, and enable the WA society to learn from practical sustainability experiences.*	Agreed. This is how Implementation is envisaged and is already occurring.

A sustainability framework *continued*

200303092: Housing Industry Association	2, p.6	The Process Principles should be reworded so that they are inclusive of all participants and not just Government. *A fundamental flaw in the draft report is its preoccupation with Government 'control' and a corresponding exclusion of the philosophical approach of government, industry and community <u>working together</u> as 'equal partners' to achieve sustainability. While partnering, roundtables and similar approaches are mentioned in the draft report, these concepts do not flow through to many of the actions. Hence, if the Process Principles were reworded to recognise this philosophical approach the subsequent actions would likewise embrace this.*	Disagree. Integration, Precaution and Hope apply equally to all parts of the community. Accountability, Transparency and Engagement is mostly about government. They are inclusive but in the end they must apply to government. This is fundamentally a government report and attempts to set Government's own 'house in order'. Part of that requires Partnerships to progress the agenda more broadly. The government can show leadership but it cannot **be** industry or **be** the community.
	3, p.6	The Goals should be reworded so that they are equally inclusive of all. The use of words such as 'we' and 'our' referred to in Goals 1 -3 juxtapositioned against the 'plan', 'support communities' and 'assist business' mentioned in goals 4 – 6 indicate an 'us' and 'them' approach, which goes against a sustainable future for Western Australia. The Goals should be reworded to be equally inclusive of all.	Changed to Sustainability Goals and Government Priority Areas for Action on the Poster. In the text they are already like that. The 'our' and 'we' refer to the State as a whole.

THE CONCEPTUAL BASIS: DEVELOPING A FRAMEWORK FOR SUSTAINABILITY

A sustainability framework *continued*

200303443: State Development Portfolio	16-20	Whilst the principle, "Settlement Efficiency and Quality of Life" is recognised as being desirable, it should be redrafted. The precept it embodies is that if less is spent on energy, materials and waste, more will be available to be spent on other areas of quality of life improvements. This ignores the use of energy and materials to assist in these areas.	This is not implied by the Principle. The two just need to occur together.
		It further ignores the fact that few resources are in short supply, at least at current energy prices. If supply becomes constrained then prices will increase, creating a series of newly viable markets, such as recycling and substitution, which - with increased attention to waste by producers initiated by higher prices - acts to reduce the draw on raw materials.	Shortage is not the reason, it is because of the multiple gains in efficiency and impact by saving resources. Price is just one mechanism for doing this.
		More specifically, the principle currently uses terms such as "the earth can only adjust to a more balanced state" and "ecological footprint" that are not yet fully accepted or clearly defined. This may also presume that the natural environment is static, whereas ecosystems are dynamic. Thus the use of these phrases should at least be qualified.	The principle has been changed to reflect this concern.
		The last of the process principles considering symbolic and iterative change should provide further explanation of these concepts, also recognising the nature and characteristics of a range of institutions and participants in society are undergoing constant change.	This is implied and is expanded in the text.

A sustainability framework *continued*

| 200304379: DEWCP | 8, par 2 | It is generally acknowledged that over the past 25 years, due to declining precipitation and increasing development/population pressures, water resource management in WA, especially in the more populated Southwest, has become significant. **The following are a list of matters that should be considered before the Strategy is finalised:**
• environmental water allocations often have not enough scientific research to back them up until more recently in WA by resource management agencies. A course is now being run by the day-to-day water resource manager at one of the universities regarding 'environmental water allocation/provisions', showing this shift in emphasis;
• water quality across the board will likely continue to deteriorate in southwest WA for a number of years (due to secondary salinity, euthrophication, sedimentation and turbidity, etc), resulting in more pressure being placed on the remaining water that is of higher quality (SOE Report 1998);
• the drying climate in the Southwest of WA will continue to impact on the available quantity of water for human use and the environment (see IOCI report, 2002);
• the increasing population and agricultural/industrial demand for more water in WA has usually resulted in decreased environmental water flows. For example, each time a dam is built, water is diverted away from the downstream environment resulting in a loss of ecological habitat and a potential reduction in biodiversity. The combination of damming rivers and a drying climate is having a serious impact on the environment (Note: more attention needs to be given to the National Principles for the Provision of Water for Ecosystems 1996);
• the Ministerial Conditions placed on the managing agency for some water resources are not being met, resulting at times in the lowering of the groundwater table. In turn, this has at times resulted in the drying of riverbeds, wetlands and caves etc, with an accompanying reduction of aquatic habitat and a likely loss of biodiversity. This situation requires further investigation and remedial action; | This section was redrafted to reflect these concerns. See '*Drinking water and Aquatic Systems*.' |

A sustainability framework *continued*

200304379: DEWCP	8, par 2	•in some cases there is insufficient information to calculate water balances for many significant water resources, even though water allocations away from the environment are still at times being permitted (Note: there is a need to apply the precautionary principle); and, • the licensing of water extractors across the State is incomplete. In some cases the data on how much water is available and how much is being extracted from the environment is also incomplete, with insufficient resources available to get enough data statewide (let alone in areas under pressure) in the short term. This will become more of an issue if and when NRM charges for water use are imposed – a portion of these fees will need to address this data issue. The need for water conservation practices, as tied to an appropriate fee regime for major water extractors, continues to be at issue statewide. In summary, there is a major issue of 'prioritising' for the manager of water resources to address the aforementioned items, due to current budgetary constraints, and there are additional governance issues related to water to consider.	
200309737: Office for Women	6	The State Sustainability Strategy currently holds a number of opportunities for the inclusion of gender equity principles. They include ensuring that: . gender is integrated into the foundation principles, the Sustainability Code of Practice, proposed Action Plan guiding principles, indicators and process principles for sustainability	Gender issues have been included in three places
200303055: Graeme Olsen	2, pg. 16	Box 5 "Resource use and sustainability" (page 29) is quite misleading. "Decoupling of resource use and wealth" perpetuates a myth now pervading our society that tertiary industry pursuits (including fashionable jargon such as the so-called "information age", and "knowledge economy") have become independent of primary and secondary industry, and that primary and secondary industry are no longer needed…. Instead of describing this process as the "decoupling of resource use and wealth", it should more accurately be described as the "decoupling of *increasing* wealth from *increasing* resource use, due to continued increase in efficiency with which resources are used". This is demonstrated by a number of indices that show static or declining resource use per capita and per unit of GDP.	Agreed. Box text has been altered to clarify this.

Indicators for sustainability

CIB #	Submission paragraph no.	Paragraph Text	Response
200300089: Phil Thompson	9	Table 1: 'Wealth increasing'; in other words growing. Why? This is not sustainable	Why not, if it is decoupled from resource use and environmental impacts?
	10	Table 1: 'Ecological footprint index per capita': why just 'per capita'? There should also be a total ecological footprint index, to ensure that the full impact of population growth is measured.	It is already done but the indicator needs to show that it is also reducing per capita or it is not helping sustainability.
200303162: Robin Chapple & Giz Watson, MLC's	2, p.5	Sustainability indicators – no commitment to a strong framework of relevant indicators of consumption, pollution etc. Ecological footprinting must be central to public awareness	See "*Measuring and Reporting…*"
200303348: Conservation Council of WA	3, par 5	We are extremely concerned that the draft strategy does not address the issue of sustainability indicators. The Government's pre-election policy called for the development of 'alternative measures of economic growth/performance'. A promise was made to allow for community input into the determination of 'quality of life' indicators. The draft strategy makes no mention of this pre-election policy. We are bitterly disappointed that no action has been taken to start developing these indicators nor to comprehensively consider them in the draft strategy. It is essential that this be addressed in the final strategy.	See "*Measuring and Reporting*" and commitment to State of Sustainability Reports.
200300307: Hamersley Iron	6, p.1	In particular Hamersley notes that the use of ecological economics to include the polluter pays principle and the need for full life cycle for costing of goods and services can impact on the competitiveness of businesses and industry in general. Hamersley cautions the State that approaches undertaken to embrace full life cycle cost accounting in isolation from other jurisdictions may adversely impact on Western Australia's cost structure for business and competitiveness.	Noted. The movement towards full life cycle costing is proceeding globally, WA is unlikely to be the world leader nor should it be tardy in adopting this approach.

Indicators for sustainability *continued*

| 200303073: Natural Resource Management Council | Point 3 | 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. | Noted. This is a large task and could be something the NRM Council may wish to develop further. |