

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

Forward – Summary & General Comments

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300886: Mr. J.E. (Eddy) Wajon	2	If there was any criticism I have it is that many of the proposed actions are very broad and general. I hope we will see the detail in the Implementation plan. The support given to implementation will be important, as the concept is still complex and many people are still uncertain regarding what it means. I hope the Strategy doesn't just end up sitting on bookshelves gathering dust.	The final Strategy clearly allocates responsibility for actions to relevant agencies. See <i>Implementation and action plan</i> .
200300359: Bernhard Bischoff	1	Re the Summary (pg.8 of draft) : I would like to see the 3 rd paragraph expanded and repeated in various shapes throughout the policy as a reminder that there are compelling reasons why Western Australia should be part of the global agenda. We Western Australians are in the unfortunate situation that due to the way the country has responded to our activities since our arrival here we are virtually forced to rethink the way we live and use our resources, if we want to have a future comparable to our present. This paragraph spells out many sad truths without resorting to direct criticism. I will be less diplomatic, because the truth is, that we have raped the country, we have not only been blind and greedy, but also stupid and very slow to learn.	See below
	4	The Consultation Draft could say more about why there is the need for a sustainability strategy. It may be painful to reflect honestly on the reasons. But is it not true, that until we understand and admit our mistakes, intentional or not, we may not accept the need to re-evaluate our actions or the need to change our attitudes? While many people will reject a serious talking to, many others might just accept past mistakes and try and develop a new attitude.	The State Sustainability Strategy tries to show both the reality of the challenges that we are facing and the need to undertake action that creates hope for the future.
200303883: Sustainable Development Facilitation	2, p.3	The Sustainability Strategy does not demonstrate the increasing importance of multi-stakeholder decision-making processes. We believe this is a critical aspect of progressing towards more sustainable processes and needs to be highlighted further in the document.	Disagree. The final State Sustainability Strategy includes a number of actions that rely on multi-stakeholder decision-making processes.

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200300889: John Vukovich	P 2 par 10	P10 "The government is hoping to establish Sustainability On Line, a one-stop shop for sustainability information." In the last census, only 37% of Bunbury people were using a home computer while the national average was 42%. Bureaucrats tend to ignore those figures because of the convenience of Web Sites. Are libraries going to be supplied with "hard copy" of sustainability information? Non-computer users are being pushed into another column of the ever-increasing underclass.	Computer usage is rapidly growing. Other sources of information remain but on-line services enable a level of transparency not available before.
	P2 par 11	P11. "Shifting agriculture to a more sustainable basis will require continued innovation to develop new industries..." The shift to sustainable agriculture does not require anything new- it requires throwing out the modern system of oil-based broad acre hydroponics.	This is not an option in the short term.
	P2 par 12	"The development of the new Forest Management Plan provides the opportunity to put in place a framework for the sustainable management of forests into the long-term." The new FMP does not advocate sustainable forest management. The most conservative calculations of the logging rotations periods gives jarrah 72 years- not nearly long enough to form the hollows necessary for the survival of fauna or to produce high grade timber	The Forest Management Plan approved by Cabinet provides for sustainable yields based on the precautionary principle.
	P3 par 2	"Community Services" Children's services did not get a mention. They are the most neglected members of our society and should be given the vote.	Children's services are part of a number of Departments.

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200303164: Australia Petroleum Producers and Exploration Association (APPEA)	P 6, par. 3-5	<p>At an industry level the draft Strategy's definition, goals and supporting information discount three key elements of the sustainable development picture concerning oil and gas:</p> <ul style="list-style-type: none"> ▪ safety; ▪ governance; and ▪ viability. <p>Safety: Oil and gas producers regard safety as fundamental to the concept of sustainable development. The industry has made safety its first priority in building a long term future. Workers in the oil and gas industry and all other economic sectors, have the right to a safe work place. By definition, an unsafe work place in an unsustainable work place. In our view, safety is not a minor subset of community benefit or social improvement; it is a priority of sustainable development. After all, for some offshore safety incidents there would be associated social and environmental impacts.</p> <p>Governance: The Strategy calls for government leadership in the development of a sustainable future. In addition, the report highlights the need for accountability and community involvement in the process. To achieve these elements of sustainable development the draft Strategy will need to establish a context for appropriate governance in sustainable development. The obligations apply equally to business and Government. Companies must set corporate governance standards to make sustainable development part of the internal management and auditing process. The State Government must develop an effective framework for the implementation of its policies. This goes to the heart of the implementation process.</p>	<p>Safety has been added into Principle on Equity and Human Rights. Safety is part of the sustainability agenda as is occupational health. It is clearly a high priority for APPEA but its not "first priority" in the State Sustainability Strategy in terms of examples of the concept. Each industry needs to work out for itself how the integration of such factors into the mainstream of decision-making can make them more viable. However more has been added in the Occupational Health and Safety issue in "Embracing sustainability in government agencies" and "Mining".</p> <p>Whole section of the State Sustainability Strategy is on Governance and is clearly of very high priority. Governance in business is covered by Accountability Principle.</p>
	P 6, par. 6	<p>Viability.</p> <p>The link between viability and sustainable development is fundamental to the potential for an effective Strategy. The goals of the draft Strategy would be difficult, if not impossible, to achieve without business viability. Therefore, the efficiency of sustainable development processes in W.A. will be critical to the chances of success. If the structures are cumbersome, bureaucratic and inefficient, return on investments will be reduced and sustainable development in the resources sector and the community will be inhibited. To achieve the kind of continuous improvement which sustainable development implies, business will have to increase efficiency, reduce costs, manage commercial risk and maximise opportunities. The social and environmental goals of the draft Strategy depend, in part, on business viability. Therefore, return on investment should be regarded as a legitimate and important dimension of sustainable development.</p>	<p>Much greater emphasis on financial viability in the final State Sustainability Strategy.</p>

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200303164: Australia Petroleum Producers and Exploration Association (APPEA)	7, par. 1-2	Sustainable development and a National Approach :... In comparison to other state governments, the W.A. Government has an emerging leadership position in addressing the complexity of sustainable development. However, it would be difficult and somewhat artificial to implement the draft Strategy in isolation from a national approach. APPEA recommends that the draft Strategy in its final form recognises that sustainable development is a national issue and as such, the implementation of the draft Strategy's long term goals, objectives and proposed actions is undertaken with a nationally uniform approach in mind. A national approach should establish linkages between all State and Commonwealth sustainable development initiatives.	Other State Governments are undertaking work similar to the State Sustainability Strategy that could contribute to a National approach. Many major resource companies suggested they could not relate to the full sustainability agenda demanded by the public until the State Government develops a framework. Western Australia's extensive resources industry demands that our State leads in this area.
	7, par. 4	APPEA seeks nationally coordinated approaches in all initiatives, such as the W.A. draft Sustainability Strategy, to ensure Australia's oil and gas industry remains internationally competitive and contributes to Australia's community and economic growth to the industry's fullest potential.	Noted.
	8, par. 5	APPEA categorically rejects any strategy for implementing sustainable development based upon a prescriptive, 'one-size-fits-all', target based approach. A prescriptive approach will be ineffective, costly to industry, create costly bureaucratic difficulties for government and destroy more opportunity than such an approach would create.	Agreed
200303348: Conservation Council of WA	2, par 6	As stated in our previous submission, in order to truly make sustainability happen a priority should be a comprehensive legislative review ('National Competition Policy style') of State legislation to incorporate sustainability in a consistent manner. Incorporating sustainability principles in legislation as it is reviewed is not good enough.	The State Sustainability Strategy includes a Sustainability Act.
200304379: DEWCP	2, par 1	In August 2002 DEWCP submitted a table on what were believed to be important and relevant roles and responsibilities of Government, Business and the Community. This approach could be reviewed, to show major items to be addressed by the Sustainability Strategy, perhaps in an Executive Summary. The table is submitted again so that this approach can be considered and the table adjusted as appropriate.	This has been added to the final State Sustainability Strategy

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200217802: Heritage Council	4, p.1	<p>Other suggestions we'd like to make are as follows:</p> <p>i. We'd recommend adding a short paragraph to the one presently appearing under the heading 'Heritage' on page 13, to make clearer why heritage conservation is part of sustainability:</p> <p>Heritage conservation does not stand in isolation, but is inseparably linked with economic development, tourism, urban 'livability', reduction of waste, and the social cohesion of communities. It is a major asset in promoting goals in these related areas, and it helps provide the 'glue' that holds them together.</p>	This has been added to the final State Sustainability Strategy.
200303443: State Development Portfolio	13-15	<p>This section of the report mentions the declining terms of trade in agriculture but does not mention it in relation to anything else. Declining terms of trade occurs when the prices received for an industry's output falls relative to the prices paid for its inputs. Terms of trade declines have affected a range of other industries over time including forestry, mining, mineral processing and refining as well as industries in the manufacturing and services sectors.</p> <p>Greater output at reduced costs leads to reduced prices to the benefit of society. Sustainability concerns in much of the agricultural region are not due to declining terms of trade, rather the costs and effects of environmental issues such as land clearing, soil erosion, and salinity.</p> <p>It is suggested that the reference to declining terms of trade for agriculture should be deleted as it establishes a different frame of reference for agriculture relative to other industries and businesses.</p>	This has been addressed in the final Strategy.

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<p>200303088: Australian Association of Planning Consultants (AAPC)</p>	<p>1</p>	<p>The recommendations listed below summarise the main points of our submission and are asserted on the basis that their inclusion will result in a more complete and robust document and make a significant contribution to its successful implementation:</p> <ul style="list-style-type: none"> • Include the following as distinct areas of examination in the document: <ul style="list-style-type: none"> Urban design, subdivision and land development process, The role and relationship of the State Planning Strategy, Revitalising rural settlements, country towns and regional centres, and Legislative context and reform. • Evaluate and prioritise all proposed action • Compile a realistic & effective implementation programme • Expand the range of implementation mechanisms <p>There is a need for simple assessment processes to avoid delays in application assessment and approval lead times</p>	<p>The final Strategy has a new section on Sustainable Urban Design. The State Planning Strategy is addressed, as is rural settlements and legislative reform.</p> <p>Responsible agencies will do this as part of the preparation of Sustainability Action Plans.</p> <p>The range of implementation mechanisms have been expanded. This will be addressed through the Sustainability Scorecard.</p>
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200303088: AAPC	1	<ul style="list-style-type: none"> • Integrate administrative structures & procedures rather than adding to them • Ensure that sustainability assessment results in a change of emphasis, not a new industry • Ensure that sustainability assessment indicators have the capacity to achieve net sustainability gains. • Include AAPC representation on the Industry-Government Working Group on Sustainability Assessment • Allocate sufficient and appropriate resources for effective implementation of the Strategy • Acknowledge the State Planning Strategy as a key implementation mechanism for the Strategy • Place greater emphasis on sustainability measures for country towns and regional centres • Examine opportunities for housing on all government redevelopment sites within the metropolitan regional areas. • Develop agreed principles on what constitutes sustainable development in relation to urban form. 	<p>Agreed.</p> <p>Agreed. Additional skills are required.</p> <p>Agreed.</p> <p>Membership of the Working Group was open.</p> <p>Agreed.</p> <p>Agreed</p> <p>This can be addressed through Regional Sustainability Strategies.</p> <p>Part of new Affordable Housing Committee.</p> <p>This will be considered through the Government’s Dialogue with the City and partly through the Sustainable Urban Design section.</p>
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200303088: AAPC	2, par. 5	The structure of the framework is clear and logical, conveniently illustrated in poster form at the back of the document. However, there is some inconsistency in the extent to which each of the priority areas have been covered and the extensive array of proposed actions, ranging from the specific to very general, do not give a clear indication as to what level the Strategy is pitched:	Noted.
	2, par 7	There is little reference to the <i>State Planning Strategy</i> even though its objectives are similar to the Sustainability Strategy and is structured on the key principles and outcomes of social, environmental and economic sustainability.	The State Planning Strategy is mentioned and will be reviewed to reflect sustainability principles.
	3, par 1	Although the document is strategic rather than statutory in content an examination of the legislative context and opportunities for reform should form part of the proposed actions. This is necessary if the Strategy is to be successfully implemented and is particularly relevant to the proposed use of statutory planning mechanisms, such as Statements of Planning Policy.	Agreed. Opportunities for reform will be considered by the WAPC's Standing Committee for Sustainability.
200309647: Communications Advisory Committee (CAC)	4, par 5	Communications required before "Sustainability" can even start: Mentioned above was the fact that the first domestic satellite for Australians, long overdue, was finally "sold" to the Australian community on the basis of a "fair go" for phone services to remote areas. Subsequently development of a low impact communications of many varieties is now fundamental and essential part of every project in Western Australia, whether it is...phone, GPS etc...	A communications strategy will be developed.
200303348: Conservation Council of WA	2, par 2-4	While the draft strategy contains many worthwhile initiatives we are concerned that the recommended actions are largely ad hoc with some being too specific and others too general. Visions, objectives and outcomes are in many cases confused. We are concerned that essential elements needed to deliver sustainability are either not addressed or are inadequately addressed, such as institutional arrangements and sustainability indicators, for example. The Environmental Alliance has made several substantial submissions to the sustainability process over the past 2 years, including a detailed submission to the 'Focus on the Future' discussion document. We are concerned that many of the points made in these submissions have been ignored in the process to date. We recommend that these documents be reviewed again.	Noted. Both institutional arrangements and legislation is addressed in the final Strategy. Public submissions were considered in detail in preparing the final State Sustainability Strategy.

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200303348: Conservation Council of WA	1, par 7	Genuine sustainability is about meeting environmental, social and economic goals, but the draft strategy does not adequately incorporate the social and economic justice dimensions of sustainability. The form of sustainability in the draft strategy is primarily the interaction between environment and economic issues. The draft strategy is particularly deficient with respect to social issues – these will need significant attention in the final strategy.	The final Strategy attempts to reflect the importance of the social dimension in sustainability. This has not been attempted comprehensively anywhere else in Australia.
	2, par 3	The Environmental Alliance committed a considerable amount of energy and time into producing a submission to the original consultation document. We are disappointed that very little of this material was commented on in the draft strategy, apart from occasional quotes in the document.	Public submissions were considered in preparing the final State Sustainability Strategy.
200303074: Department of Conservation and Land Management (CALM)	1, par 6	An overriding weakness in the draft Sustainability Strategy is the relative sparseness of its consideration of the role biodiversity conservation plays in any sustainable society. The ongoing cycle of habitat degradation and species loss cannot be permitted to continue. Furthermore, there is the need to consider in all areas of development the ecosystem services provided by biodiversity.	The role of biodiversity has been expanded in <i>Global, Natural Resources</i> and <i>Settlements</i> sections. <i>Sustainable Urban Design</i> develops the ecosystem services concept.
	3, par 3	It is fundamental that the State Sustainability Strategy maintains consistency between objectives, proposed actions and indicators/targets. For instance, there are inconsistencies in this regard for the priority area <i>Maintaining our Biodiversity</i> . The second objective aims to protect biodiversity through reservation and off-reserve management, however, there are no actions identified to achieve this objective. This occurs throughout the document. It is highly recommended that the “In short...” sections in the draft document be reviewed for the final Strategy, so that the objectives relate directly to the proposed actions and targets/priorities, therefore ensuring that consistency is maintained.	Off reserve management is part of <i>Biodiversity</i> section and also <i>Natural Resources</i> and <i>Settlements</i> .
	3, par 4	It would be useful if, following consultation and agreement with Ministers and agencies, the final Strategy indicated the agency/organisation/institution responsible for carrying out the proposed actions for each priority area. This will not only inform agencies of their responsibilities under the Strategy, but also indicate to the community the roles of different agencies in implementing the Strategy.	Agreed and included in Action Plan.

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200303349: EARTH	Page 1	<p>There is a complete lack of commitment by the government to the concept of public consultation and to proper democratic practice.</p> <p>Generally the government has inadequate and tokenistic public consultation, which like that for the Draft State Sustainability Strategy, is poorly advertised and held at unsuitable times such as during business hours.</p> <p>It would therefore be more conducive to true and real community participation to have community form the strategy based on their hopes and dreams for the future, leaving it to government agencies to pull these together into a coherent strategy with elaborate negotiation and democratic process.</p>	<p>This is not supported.</p> <p>There were considerable opportunities for public participation in the final Strategy, including through written submissions.</p>
	Page 2	<p>Our primary concern lies with the strength of its (SSS) promises and proposed actions. In particular, how they could protect the bush environment in the vicinity of our shire of Mundaring.</p> <p>A recent threat to our local environment has come in the form of a Water Corporation proposal of a new water treatment plant for a site in Sawyers Valley. With regards to the failure of current legislation and statutory bodies in protecting this exemplary bushland from decimation, EARTH requires evidence that the new State Sustainability Strategy will honour its commitment to biodiversity, catchment protection and preservation of our natural environment.</p> <p>We request a response that clearly indicates how the strategy intends to prevent this kind of event from occurring and demonstrates in what ways the promises of the strategy are any more binding or powerful than legislation currently in effect.</p>	<p>This is outside the scope of the Strategy. It is not designed to take planning powers away from democratically elected local councils and from other decision-making bodies. It is designed to try and ensure more integration of these factors into decision-making.</p>
200303425: Fire and Emergency Services Authority of WA	2, pg. 3	<p>This submission deals primarily with matters of omission in the State Sustainability Strategy consultation draft. The document contains virtually no reference to safety/natural hazard/mitigation issues and the need to foster community capacity to deal with such issues. As maintained this important area needs to be considered as part a suite of sustainability actions.</p>	<p>Agreed. Reference to safety matters has been reflected in the final Strategy.</p>
200303057 Future Directions Intern.	2, par 4	<p>The Draft Strategy places considerable emphasis on the role of local government. Although this offers opportunities for community engagement, local government is less likely to have necessary resources and expertise to immediately fulfil the role proposed in the Draft Strategy.</p>	<p>Noted.</p>
200303074 WASIG.	3, p. 3	<p>The principal weakness of the Draft State Sustainability Strategy is its lack of strategic focus. It expands extensively on potential actions at the micro-level, albeit most often without verifiable performance criteria and targets.</p>	<p>The State Sustainability Strategy is both strategic and action-oriented.</p>

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200303074 WA Sustainable Industry Group (WASIG)	4, p. 3	Many in the WA SIG have concerns that this Draft State Sustainability Strategy does not properly recognise the critical contributions businesses make to translate sustainability concepts and ideas into affordable products and services that bring quality of life, with minimum environmental impact and maximum benefit for the community.	The final Strategy places additional emphasis on the role of business in sustainability.
	5, p.3	The WA SIG recommends changes in the Draft State Sustainability Strategy, under the following five overarching headings: Be Strategic About Sustainability: Get the Framework Right: Take Actions that Make a Difference: Make Factor 4 a Reality: Turn Strategy into Action:	The Strategy is about strategic approaches to sustainability. The Framework remains largely unchanged very few changes were suggested. Actions that make a difference have been included in the final Strategy. Factor 4 needs now to be developed with WASIG.
	4, p.7	The WA SIG recommends that the Draft State Sustainability Strategy be made more strategic and targets the establishment of an adaptive and participatory sustainable development management system that catalyses continuous improvement and progressively secures ownership, commitment and enactment on mutually agreed visions, goals and targets, across State and local governments, the private sector and civil society.	The Sustainability Roundtable will support continuous improvement as well regular review of the Strategy.
200303092: Housing Industry Association (HIA)	4, p.4	The draft report's focus is on government action rather than giving serious consideration to a strategy that also embraces existing industry actions such as, HIA's GreenSmart programme which has been acknowledged recently by the Australian Building Energy Council as industry best practice in education in energy efficiency greenhouse gas abatement and ESD for the building and construction industry was established under an agreement of the Ministerial Council on Greenhouse in the late 1990's as one part of a dual approach to controlling greenhouse gas emissions in the housing sector.	State Sustainability Strategy is necessarily about government. It recognises GreenSmart which will be further considered in the development of the Sustainability Scorecard (BASIX). See <i>Settlements</i> .
	7, p.4	In last four years since the launch into WA of the HIA GreenSmart programme by the Minister for the Environment, the State Government has done little to educate the public to seek green housing, it has not provided adequate rebate systems to home owners/occupiers and it has not undertaken any research into embodied energy.	Noted.

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200303092: Housing Industry Association (HIA)	p.5	<p>HIA would like a cost impact analysis undertaken of the measures recommended in the draft report prior to final adoption of the State Sustainability Strategy.</p> <p>HIA seeks assurance from the State Government that the Proposed Actions and Strategies contained in a State Sustainability Strategy would not add to the cost or length of time taken to obtain development approvals.</p> <p>HIA recommends a single development assessment system for all land use applications in the interests of transparency and accountability.</p> <p>HIA recommends that the final State Sustainability Strategy incorporate the many actions being undertaken by industry and communities in sustainability.</p> <p>HIA requests inclusion into a specific partnership with the State Government for WA's housing sector and seeks recognition by the State Government for its GreenSmart programme</p> <p>HIA recommends that the State Government has a comprehensive budget item to educate home occupiers on how to use their homes sustainably.</p> <p>HIA suggests that the State Sustainability Strategy is be managed by the urban and regional planning and infrastructure system, with a new coordinating unit for all other aspects of the strategy that is centrally housed in the Premier's Office.</p> <p>HIA recommends that a new central research and development team is established in the Department of Housing and Works to undertake sustainable housing research. The directions for the team should be overseen by a steering committee comprising representatives of industry, community and governments.</p>	<p>Noted.</p> <p>Processes should be designed to achieve this. See Box in the final Strategy on Sustainable Land Development Project.</p> <p>Agreed. This is the basis of the Sustainability Scorecard.</p> <p>This is outside the scope of the Strategy.</p> <p>Agreed.</p> <p>The final Strategy contains an action to develop a Sustainable Living program.</p> <p>Agencies will be responsible for implementing the vast majority of actions within the core business. The Sustainability Policy Unit will retain a coordination and oversight role. Department of Housing and Works Policy research does include this.</p>
200303443: State Development Portfolio	4	<p>In developing the definitions of sustainability, the Strategy should also recognise that there is a limit to the extent that actions can be taken to conserve energy, water, etc, this being the point where the costs associated with the conservation action outweigh the associated benefits. ...</p>	<p>The whole basis of sustainability is to find new and more efficient ways to use fewer resources and minimise costs.</p>

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200303443: State Development Portfolio	5	The Strategy would benefit from inclusion of discussion/definitions regarding the meaning of the various “sustainability” terms that are used throughout the document (e.g. eco efficiency, bioprospecting, green procurement, etc). It is important that if the concepts aligned with sustainability are to be adopted and embraced by the general population then they need to understand the concepts under discussion. Alternatively, a glossary of significant terms could be developed as a useful point of reference for readers of the document. (This material could be incorporated into the explanation of Sustainability Techniques – Box 6, p.33).	Noted.
	8	There is also a concern that the Strategy appears to use the WA Collaboration as a proxy for consultation with the wider community. ...	Noted.
	12	The overall layout is logical and the Strategy is comprehensive, however readers expect action numbers to align with section numbering. For example Action 3.5 Coastal Strategy is expected to be in section 3 rather than section 5. It is suggested that action numbering and section numbering be aligned in the final document.	Agreed. This has been addressed in the final Strategy.
200303414: Dr J. Morgan Williams	3, p.2	Currently the biggest force shaping our perceptions of our needs and wants is consumer advertising...see document for more.	Agreed.

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200309737: Office for Women	Pg. 3	<p>The State Sustainability Strategy currently holds a number of opportunities for the inclusion of gender equity principles. They include ensuring that:</p> <ul style="list-style-type: none"> . all data to be desegregated by gender (taking into account the diversity of women) . gender equity and diversity principles (taking account of the diversity of women) apply in all appointments and chairpersons to proposed sustainability planning groups (eg. Regional Roundtables, Indigenous, Industry groups and especially women headed households) . women are recognised as key consumers, and important decision makers in families and communities, especially where change is required . the EPA develops best practice international gendered approach to environmental policy . environmental degradation impacts on the most socio-economically disadvantaged members of the community and women are disproportionately more financially disadvantaged than men for a whole range of reasons but more specifically because more women are sole parents and more women work part-time . profile women's environmental groups, statistics of women and men involved in environmental action groups and relevant women's best practice projects (showing the diversity of women) eg UK Real Nappy Project 	Incorporated gender issues into three parts of the final State Sustainability Strategy.
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200303355: Pilbara Development Commission		<p>In particular, the Commission would like to see the Sustainability Policy to be integrated with State Government's Regional Development Policy and Citizenship Policy. However, the Commission recommends that the Draft Sustainability Strategy would be strengthened by:</p> <ul style="list-style-type: none"> -Providing a framework and mechanisms by which the community is able to participate in the process of developing and assessing criteria which must be satisfied to ensure a project or industry development is sustainable rather than localised and individual actions. -The use of the State government's existing regional boundaries as defined in the Regional Development Commissions Act to define sustainability regions. -Allowing communities to use the principle of net benefit when examining issues of sustainability in regional areas. -Acknowledging whilst "the region" may provide a sound basis for sustainability, sustainability flows across regional, state and national boundaries and this needs to be balanced against localised concerns. -Confirming that Regional Development Commissions are the State Government's agent for facilitating local, informed, and participatory processes, which allow a balance between economic, ecological and social sustainability and values to be reached by industry and community at a regional level. -Not prescribing 249 individual actions but empowering Regional Development Commissions and regional communities to work with industry and business to determine their priorities and actions for sustainability. 	<p>Agreed.</p> <p>Sustainability Assessment should do this.</p> <p>These will need to be considered as part of the development of the methodology for Regional Sustainability Strategies.</p> <p>Agreed.</p> <p>Agreed.</p> <p>This will be reflected through amendments to the Regional Development Commissions Act.</p> <p>This would be usefully considered in the development of Regional Sustainability Strategies.</p>
200303165: Swan Catchment Council	5, p.1 1-2, p.2	<p>By attempting to cover holistically the whole range of issues of sustainable living the document fails to inspire. The document could be improved by a very strict edit so that it becomes readable. It is very obvious that different sections have been written by different individuals and there are several contradictory statements.</p> <p>Much of the background reading in the "sense of place" neglects to consider those many community members who already have a very refined sense of the area in which they live and work.. In saying this we do not reject the concept as a very workable regime.</p> <p>By covering so many issues, natural resource management and protection issues of interest to the Swan Catchment Council have tended to become less important which is of concern.</p>	Noted.

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200303165: Swan Catchment Council	5, p.2	There is also a serious lack of recognition of the NRM regions – these regions have the great responsibility of preparing a regional Natural Resource Management Strategy on behalf of their community for adoption by the State and Federal Governments.	This has been reflected in the final State Sustainability Strategy.
	8, p.2	There is a serious lack of understanding by the authors of this document of the role played by community volunteers in implementation of any government program. The community is willing to help but almost all the actions to be carried out to implement this strategy will have to be carried by volunteers. This puts enormous pressure on already stretched community people.	This is not supported. Volunteers have greatly assisted the development of the State Sustainability Strategy).
200303269: Global Olivine	5, p.3	While much of the Consultation Draft appears to focus on the tenets of sustainable economic, environmental and social development, these seem forgotten by the time the report reaches the section on “Reducing and Managing Wastes”. At this point, references to the tenets of sustainability that flow through the balance of the document are replaced by references to dogma, ideology and pre-determined courses of action that do not appear to have been tested in terms of their economic, environmental and social sustainability.	Have tried to minimise this.
	4-9, p.4	<p>The Consultation Draft acknowledges the need to proceed with caution. It suggests that we should “<i>avoid poorly understood risks of serious or irreversible damage, designing for surprise and managing for adaptation</i>”. What it stops short of saying is that Government will support those proposals that demonstrate that they will lead to a more sustainable lifestyle than and which can demonstrate that the risks associated with their proposal are both well understood and, using established and defined bases of measurement, acceptable. This omission calls into question the extent of the Government’s commitment to sustainability. It suggests that the Government’s commitment may be subject to political interference. If this is the case, then the Precautionary Principle is at serious risk of being abused. Invocation of the Precautionary Principle is already being used by interest groups to slow down or stop progress along the road toward a more sustainable Western Australia.</p> <p>Unless, the Government makes a clear commitment to support proposals that clearly demonstrate that they embody the Foundation Principles contained in this draft document, then it is likely that the aspirations that are contained in this document will remain just that.</p> <p>The Government must decide whether it is seeking to establish a Western Australia that is as sustainable as it can possibly be, or a Western Australia that is more sustainable than it was, but well short of where it could be. If “just” is good enough, then the Government should declare its position now.</p>	Precautionary principle in State Sustainability Strategy includes social and economic factors too. There is likely to be ongoing debate about the application of the State Sustainability Strategy in particular situations.

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200303269: Global Olivine	1, p.5	Despite the fact that the sustainability strategy is seeking to broaden the way in which we value things, the fact remains that for the time being, the prime determinant as far as decision making is economic cost.	The State Sustainability Strategy attempts to find ways that economic costs can be integrated with social and environmental.
	3-4, 9 p. 5	One area which we believe merits exploration is the need to make an assessment of the sustainability of new proposals. At least one of the submissions to the Sustainability Policy Unit, that of the Eastern Metropolitan Regional Council (EMRC), identified that this was not presently a statutory requirement. If Government has the level of commitment that it suggests, then we believe that assessment of the sustainability of a given proposal would be a valuable tool that could be explored to ensure that development in Western Australia was sustainable. ... We see mandatory assessment of proposals in the light of all alternatives and the impact that they will have on the overall activity that the proposal is designed to address as being an important additional tool that should be included in the Sustainability Strategy.	Agreed. The final Strategy outlines the Governments intention to develop sustainability assessment for complex or strategic projects and for development control in the planning system.
	6, p.8	Government manipulation of markets should be kept to a minimum and only employed where the benefits in terms of sustainability are clear.	Agreed.
200303149: Swan River Trust	1, p.4	All foundation and process principles, visions and goals are supported. Of course, it is essential that specific performance measures for each are developed, as interpretation of the text is dependent on individuals' values. It is suggested that in the final strategy, a system for further organising the actions is needed. The system should also be a hierarchical system to isolate the most crucial action areas. It may be possible to isolate general actions for actions that are specific to one sector. One suggestion for Trust staff is that the actions proposed for each goal are relatively similar, perhaps actions could be grouped systematically, using headings such as below. <ul style="list-style-type: none"> • Defining sustainability / target setting • Education and empowerment • Forming partnerships • Institutional arrangements • Governance • Implementation/process management Then actions could be presented in a matrix. (See document for the matrix)	This will be addressed in the Sustainability Action Plans.

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200303091: Chamber of Minerals and Energy	4-8, p.2	<p>Emphasise more strongly its importance to the key global challenge of delivering rising standards of living and quality of life to a rapidly growing world population without compromising the underlying ecological support systems now or in the future.</p> <ul style="list-style-type: none"> • Change the title to “State Sustainable Development Strategy” which is more dynamic than “State Sustainability Strategy”. Sustainable development is what the State, including the public and private sectors, needs to do in order to achieve the outcome of sustainability. • Amend the criteria for determining sustainability to net aggregate benefit rather than simultaneous achievement of gains in economic, environmental and social benefits which in many cases will be impractical and if applied rigorously and over-zealously could lead to economic, environmental and social stagnation. • Consider implementing the strategy in two phases, the first to determine principles, policies and governance and the second to consider “action” recommendations after they have been prioritised, costed and justified. • Further define the roles of the parties, including Government, establish a process to manage any jurisdictional issues with the Commonwealth and other States, and consider the inclusion of health and safety, technology and research and “selling” sustainability to consumers as components of the overall strategy. 	<p>This is reflected in the final Strategy.</p> <p>Sustainability is the approach that leads to sustainable development. This is discussed in the final Strategy.</p> <p>“...strive to achieve net benefit...” is the principle.</p> <p>The final Strategy contains both a framework and actions. One without the other would be ineffective. The final Strategy has further addressed this. Additional emphasis is given to health and safety, research and development and education.</p>
200303740: WA Council of Social Service (WACOSS)	6, p.3	<p>WACOSS believes that an important aspect of defining social sustainability is providing a sense of vision and goals for communities at the state, regional and local levels. To this end the WACOSS Model of Social Sustainability identifies a set of five principles which make communities healthy and livable both now and in the future, ie: equity, diversity, interconnectedness, quality of life, democracy and governance</p> <p>We believe that these principles need to be explicitly incorporated into a State Sustainability Strategy. While notions of diversity, interconnectedness, quality of life and democracy and governance are implicitly expressed in the <i>Consultation Draft</i>, we believe that the principle of equity is not sufficiently expressed.</p>	<p>This is reflected in the principle related to equity (Principle 2).</p>

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200303740: WACOSS	1-3, p.6	<p>Finally WACOSS believes that the issue of poverty in our communities needs to be explicitly named and addressed as part of a State Sustainability Strategy ... WACOSS believes that this inequity can begin to be addressed via a range of strategies in the areas of employment, housing, provision of services, and supporting the capacity of the non-government social service sector to respond to community issues.</p> <p>WACOSS 2003/04 pre-Budget Submission Thriving Communities contains a range of recommendation which we believe will make significant progress towards addressing these issues. We therefore attach this submission for consideration and integration into the State Sustainability Strategy.</p>	Agreed. A Box on Poverty has been added to emphasise this important issue.
200302774: Waste Management Association	1, p.7	<p>Overview: The WASTE 2020 vision is “Towards zero waste by 2020”, the vision is not “...for zero waste by 2020”. This is a serious misrepresentation of the vision.</p> <p>The Strategy provides the basis for all levels of government, industry and the community to work <u>towards</u> the goal of Zero waste.</p>	Agreed. This has been addressed in the final Strategy.
200303089: WA Land Information System (WALIS)	p.12-p.14	<p>RESULTS OF THE CONSULTATION PROCESS</p> <ul style="list-style-type: none"> -Discussions on the linkage between spatial information and the State’s Sustainability Strategy helps promote sustainability issues to the broader community. -Progressing the Sustainability agenda requires a ‘whole of community’ approach that parallels the current WALIS Community-based model. -Frameworks need to be established to assist in measuring success of sustainability programs. -Integration of social / economic / environmental matters can occur with assistance from a spatial information framework. -Undertaking sustainability assessments and developing / monitoring regional sustainability plans need to systematically incorporate spatial information. 	Agreed. The Strategy recognises the need for spatial information – see “ <i>Measuring and Reporting</i> ”

Forward – Summary & General Comments *continued*

200303076: WA Sustainable Energy Association (WA SEA)	1-3, p.4	WA SEA believes that the WA State Government has a responsibility of incorporating sustainability concepts and practices into all Government Departments. Sustainability is a very significant and broad concept which should be addressed by all Departments with leadership provided by a Minister with responsibility for Sustainability - WA could look to the leadership shown by the Victorian Government where the Minister for the Environment is now the Minister for Sustainability and Environment. The Environmental Protection Authority (EPA) at the moment has a limited role in the greenhouse and sustainability debate. They are not perceived to be champions of sustainability. It would be more beneficial to the sustainable energy industry in particular if the EPA is given more responsibility. Clear and comprehensive guidelines need to be established by the Environmental Protection Authority (EPA) to demonstrate to industries, companies and the community practical ways of achieving sustainability. These guidelines should be aligned with world's best practice.	Supported. The State Sustainability Strategy shows that all government agencies have responsibility for sustainability, leadership from the Premier and coordination through the Sustainability Policy Unit. EPA has a Preliminary Position Statement on sustainability. The Environmental Protection Act is being broadened to encourage strategic assessment.
	4, p.4	In particular, the development and implementation of Government policies, which support the application of sustainable energy technologies, is a proactive means of achieving sustainability. There is an opportunity to take leadership and become proactive by developing clear sustainability policy and guidelines. WA SEA believes that clear policies should be devised in areas such as bioenergy, wind, etc.	Agreed. Bioenergy is highlighted more in Sustainable Energy section.
	1-3, p.7	The draft State Sustainability Strategy highlights numerous proposed actions and strategies to be undertaken. In some circumstances (For example, reference to building codes) these have already been implemented. Most of the actions and strategies identified seem to be short term. WA SEA believes that to be effective long term strategies must be devised and implemented to ensure long-term sustainability. Further explanation is required as to how these actions and strategies will be implemented.	The Sustainability Scorecard takes this into a more long-term framework as it can be progressively amended as the bottom line and best practice is advanced consistent with continuous improvement.

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200303354: Western Power Corporation	4	<p>A fundamental criticism is that, in its attempt to encompass the far reaching implications of sustainable development, the Strategy document is far too detailed in its treatment of issues and consequently loses strategic focus. As such, it is a good consultation and reference document, but leaves the reader with no concept of an integrated strategy for the State because:</p> <ol style="list-style-type: none"> 1. It is generally focussed at too fine a level of detail. As a result, the consultation process tended to focus on local detail and the strategic picture for the State was lost. Many of the 241 actions identified are more tactical than strategic. Treatment of Greenhouse is an example. The document highlights an evidently disparate number of greenhouse related actions that do not represent a coherent, strategic approach to greenhouse gas management in WA. Admittedly, this should come from the WA Greenhouse Strategy, but in this instance the Sustainability Strategy should stay at the level of acknowledging the Greenhouse Strategy development and not dip into isolated elements of a greenhouse response. 2. It generally reads as a document for Government agency action rather than a strategy for the State. While this might be expected of a State document, the predominance of potential processes for government agencies to incorporate sustainability actions into legislation, planning, partnerships etc seems to marginalise business and the community and there is little indication of how sustainability principles will be arrived at in a way that is consistent with the State's overall objectives. 	<p>Principle visions and strategies are provided and some detail on each. The State Sustainability Strategy is a Strategy the principles are applied through the actions.</p> <p>The Government is preparing a Western Australian Greenhouse Strategy.</p> <p>A large number of the actions involve partnership approaches with industry and the community. The Sustainability Roundtable will ensure that there is ongoing involvement from stakeholders in these important processes.</p>
	5	It would be useful to develop a companion document that embodies the State's sustainability strategy in a more concise, high level form so that it can be more easily conceptualised by stakeholders.	The poster goes some way to achieve this.
200304006: City of Perth	3	In its submission (to the consultation paper), the City also had concerns regarding the dominant focus on ecological issues and felt that social and economic issues had not been given sufficient attention. Whilst the draft State Sustainability Strategy does provide greater focus on social and economic issues, it is still felt that the Strategy could further strengthen the economic case.	Agreed.

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200303090: Woodside Energy	p.7	<p>Specifically, the draft strategy defines sustainability as: “challenging and visionary. It implies, for example, that an activity that only addresses two of the dimensions simultaneously (say provides social and economic gains but trades off the environment) is ultimately not sustainable.”</p> <p>In Woodside's view, this definition is unrealistic. Progress and overall benefit to society involve balanced development and inevitable compromise. It is difficult to see how any major resource project could proceed without some negative impact on the environment. Unless the assessment is based on contrived justifications the project would fail the sustainability test. It is far more important that all of the essential environmental, social, economic and safety factors are considered and evaluated. An activity would be sustainable if the proponents could demonstrate a net overall benefit.</p> <p>It is difficult to understand the need for a Western Australian-specific definition, when the original concept of “meeting the needs of the present without compromising the ability of future generations to meet their own needs” is almost universally recognised and supported. If the concept needs updating, then the succinct UK Office of Sustainability interpretation of “a better quality of life for everyone – now and for generations to come” would seem to be more appropriate.</p> <p>Compared to other global sustainability initiatives, the Western Australian view of sustainability is strongly focussed on a narrow social and environmental paradigm.</p>	<p>See attached paper “Response to submissions on Sustainability concepts.”</p> <p>The strategy tries to emphasise the synergies between the three elements recognising that all are essential.</p>
	4-5, p.3	<p>...the Company believes that the document goes beyond strategy and pre-empts consultation in the premature development of detailed recommendations.</p> <p>In addition, the Company is opposed to the notion that sustainability involves the simultaneous achievement of environmental, social and economic improvements. In practice, sustainability will depend on achieving a net overall benefit once all of the essential environmental, social, economic and safety factors have been considered.</p> <p>The Company is concerned that the requirement for a sustainability assessment which largely overlaps existing approval requirements, will add significantly to an already cumbersome approvals process, in contradiction to the intent of the Keating Review.</p>	<p>See above.</p> <p>Sustainability assessment is designed to streamline approvals by parallel and integrated processing.</p>