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

Section Four – Contributing to global sustainability Introduction

CIB #	Submission paragraph/page #	Paragraph Text	Response
200303443: State Development Portfolio	73	As a general comment on this section of the Strategy, it is considered that there is a need to reinforce the requirement that the adoption of sustainability principles be conducted in a manner that provides and allows for the maintenance of international competitiveness of industry participants	Sustainability says this but more – not just competitiveness but responsibility too.
200303224: Minister McHale	9	Given its location on the Indian Ocean, Western Australia has a special advantage over other states in developing social, cultural and trading relationships with the countries of the Indian Ocean Rim. The arts and cultural portfolio is particularly well placed to exploit this comparative advantage and assist the development of these relationships through cultural exchanges, research and exhibition partnerships. It has already participated in a number of projects of this kind with its regional neighbours and is planning further activities, which will actively contribute to regional sustainability. The Strategy should acknowledge that cultural understandings are central to sustainability and development of business, trade, social and security relationships in the Indian Ocean region. A statement to this effect should be included in the section Contributing to Global Sustainability.	This aspect is noted in the final Strategy. See Sustainability through culture and the arts.
200302729: Shire of Serpentine- Jarrahdale	1, pg. 9	Four key areas are identified as areas that WA can contribute to global sustainability. There is a fifth area that WA can easily contribute with and that is planning and development. We are located within a developing Asian region where there much development particularly urban development occurring. WA has world class sustainable planning and development expertise they could export to the Asian region.	Western Australian's potential contribution to this area is noted in Managing urban and regional growth and Sustainable urban design.

Introduction continued

200303590: WA Collaboration	Rec. 24	Western Australian commitment to international treaties The Western Australian Government should commit Western Australia to complying with the regime of international environmental initiatives (for example, Rio Declaration, Agenda 21, Local Agenda 21, Kyoto Protocol, Convention on Biological Diversity [which includes protection of traditional knowledge], and international social and human rights initiatives [for example, UN declarations on Human Rights and Rights of the Child, Committee for the Elimination of Racial Discrimination]). Such a commitment should inform the State Sustainability Strategy and all future policy work and decision-making. Further, the Western Australian Government should urge the Australian Commonwealth Government to make the same commitments.	The State Government is effectively bound to a range of international agreements to which the Commonwealth Government is a signatory to or has ratified. Some conventions, like Kyoto, are only legally meaningful if ratified by the Commonwealth.
200300358: F. Schnattler	Sec. 4.3, pg. 1	Additional Goals of mine for chapter 4: Establish a Global Centre for Science & Technology Education combining expertise from universities, TAFE, schools, the CSIRO, government and industry to undertake major international projects on the interrelated issues of scientific research, advanced integrated manufacturing (AIM) and eduSURE concepts and systems. eduSURE means skills Supply, skills Usage, skills Review and skills Enhancement.	Noted.
		Establish a Global Centre for Space Research & Technology combining expertise from universities, TAFE, schools, the CSIRO, government and industry to undertake major international partnership projects on the interrelated issue of how societies can BEvolve without the Earth. It means societies accept and tackle the cosmostic challenge of aeonic 'change' or BEvolution in space-time.	Outside the scope of the Strategy.
		Establish a Global Radio Channel & TV Channel that transmit and broadcast 24 hours a day national news from every nation on a rotational principle in the English language to every nation on the Earth in cooperation with the United Nations. I suggest a news service that allows to broadcast the news from all nations on the planet by radio and TV over five days, ie. 73 times a year. This is globalisation at work. See also diagram 35.	Outside the scope of the Strategy.

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200300364: Peter Wilmot and Jan Knight	2	On p75, Section 4 it states that the global population needs to stabilise, as a continuously growing population undermines sustainability. This clear statement is an important contribution to the necessary debate. However, pp75 – 79 give the impression that developing countries are most of the problem. A cynical interpretation of proposed actions 2.1 – 2.4 could be that the global population problem is just a business opportunity for Australia.	The Strategy clearly outlines the ways in which Western Australia can contribute to the stabilisation of global population growth.
200300088: Sustainable Population Australia Inc.	(First Submission) Whole Document	With regards to statement on p75 "the global population needs to stabilise, as a continuously growing population undermines sustainability". Why does the Draft not apply this to Western Australia?	
200300362: Wildflower Society of WA Inc.	4	In regard to research and development, the establishment of a Global Centre for Sustainability is welcome, but our main concern is that work in government departments and universities is now done mainly on a contract basis instead of by permanent fulltime employees. Consequently, intellectual memory and experience is no longer being held within these organisations and is lost as staff come and go. Temporary junior staff now make decisions, but do not have the benefit of institutional memory, as the few permanent senior staff that are left are overworked, have little if any time to train contract workers and are now retiring. The Strategy should address this issue.	Strategy.
200300368: City of Kalgoorlie- Boulder	12	The development of the Environmental Industries Unit within the DIT and the support for Centres of Excellence and Cooperative Research Centres is seen as positive as the need for recycling is escalating, which is a responsibility that lies predominantly with local government.	The final Strategy refers to exploring the development of a Sustainable Industries Section within the Department of Environment. See Ecoefficiency and industrial ecology.
200302969: Jack Moore	5	The paper states the problems to be solved very well, but does not give any physical targets. For example, it mentions population size, but no Population Policy. Without a Population control policy, we will eventually run out of something.	Noted.

200300140: Wetlands Conservation Society Inc.	6	The sections on greenhouse and population are very disappointing. These are areas where the Government is refusing to face up to the hard questions. In both cases we need specific policies with targets and measures. We cannot simply go on ignoring these issues because they directly affect all of the other issues in the draft. Population and greenhouse are probably the most difficult issues to address because they affect everyone and to tackle them we need to make major lifestyle changes. This is something that no democratically elected Government likes to do. However to ignore these issues is untenable because they will undermine the Strategy itself. The lack of detailed policies on population and greenhouse is in stark contrast to the detail on other major issues.	The emphasis of the final Strategy is directed to how Western Australia can contribute to stabilising global population growth. The Government is currently in the process of developing a State Greenhouse Strategy.
200303160: Goldfields Esperance Development Commission	Pg. 6	The Global Centre for sustainability would assist in this action. Our core business is very much aligned with this goal. This is especially important in the smaller towns in our region that may be experiencing decreasing populations and economies.	Noted.
200215065: Graham Chittleborough	9	In the Draft Strategy, Sustainable Population is seen as a <u>global</u> issue. Australia's relatively high rate of population increase (fertility plus immigration) appears to be of no concern, despite Australia's extremely low and declining carrying capacity. As I have pointed out repeatedly, successfully reducing <i>per capita</i> resource consumption will be negated quickly if at the same time, our population re-doubles. We can no longer pretend that we must patiently wait for a 'natural' stabilisation of our population. Events are simply overtaking us.	Noted.
200303055: City of Nedlands	19	Corporate Accountability - One glaring omission to this section has been the failure for the government to identify the need for Western Australian based companies to employ environmental Best Practice standards on their foreign investments. After all, according to Agenda 21, Global Sustainability issues where to be addressed by wealthier western nations transferring the appropriate technologies, knowledge and skills to such nations and increasing aid monies to them so they could then use newly acquired resources to implement sustainable development objectives. Yet since the Rio Summit, the amount of aid money going to developing nations has plummeted and foreign direct investment has skyrocketed rendering the people of these countries vulnerable to companies that may deliberately pollute in order to increase their profit margin (eg: the fly river in Ok Tedi). It seems that the number of firms with the appropriate environmental skills, knowledge and technology causing environmental catastrophes in nations with limited or poor enforced environmental regulations is on the rise. The report does not address this issue.	The final Strategy notes the opportunity for Western Australian firms and companies with relevant expertise to contribute to resolving sustainability issues in developing countries.

200311216: Zoe Moore	30	What about relationship between capitalism, consumption and environmental degradation?	The final Strategy discusses the relationship between resource use, wealth and consumption. Particularly the need to 'decouple' resource use from wealth. See <i>The conceptual basis: developing a framework for sustainability</i> .
200217953: The Market Place Company	61 62	The Strategy identifies the need for an improved process for the evaluation of new technologies to improve resource use and recovery. It should integrate strategic context, economic, environmental and social costs and benefits, at a local and regional level, and consider the whole materials flow system. <i>Recommended solution:</i> Development of ways to assist the commercialisation of technologies; Improvement of the environmental performance and efficiency of existing technologies; Establishment of the suitability of technologies and practices for regional applications.	This could be considered in the development of the program for how 'factor 4 by 2020' can be achieved in Western Australia. See Eco-efficiency and industrial ecology.
200300089: Phil Thompson	14	"The global population needs to stabilise, as a continuously growing population undermines sustainability".: This is considered to apply not only at the global level but at all levels eg. Australia, WA, Perth.	Noted.
	15	Vision: "Global population is stable": we need a similar vision for Australia, WA, Perth etc.	Noted.
200300363: Eastern Metropolitan Regional Council	26	The strategy assumes that Australia, as a developed country, is more advanced in many areas of sustainability, however, it should be recognized that developing countries have a lot to offer in this area, particularly "doing more with less".	Noted.
	27	The commitment to conduct a study on the relationship between population and consumption in Western Australia (Action 2.5) is supported, however the strategy should focus on sustainability consumption issues. For example, Western Australia has one of the highest consumption rates and energy use rates per capita in the world. This indicates that consumption may be more related to lifestyle and consumption behaviour, rather than population. Based on this assumption, there is a need for improved communication and education of the community in regards to reduction in consumption rates.	Noted.

200215065: Graham Chittleborough	5	Sustainable Population Policy for AustraliaIn the Draft Strategy, sustainable Population is seen as a <u>global</u> issue (Ch. 4). Australia's relatively high rate of population increase (fertility plus immigration) appears to be of no concern, despite Australia's extremely low and declining carrying capacity. As I have pointed out repeatedly, successfully reducing <i>per capita</i> resource consumption will be negated quickly if at the same time, our population re-doubles. We can no longer pretend that we must patiently wait for a 'natural' stabilisation of our population.	Noted.
200303062: Andrew Thomson	1	This document is a farce. The key issues immigration and rapid population growth (p75) in Western Australia are completely ignored and climate change received scant attention. The fact that Australians produce more than 27 tonnes of CO2 per head, the highest in the world was not even mentioned. India uses less than one tonne of CO2 per head (Clive Hamilton Running from the Storm).	Noted.
200217800: Michael Bell	14	We should explore and embrace global environmental technologies. (environmental conservation is not new, England and Europe are many years ahead) If development of our coastal wetlands is put into perspective, as to how much of the original wetland areas have been developed, I am sure that there would only be a small percentage left.	Noted.
200303047: Australian Volunteers International	2	The purpose statement of Australian Volunteers International states that: Australian Volunteers International is committed to work towards a peaceful and just world. It achieves this by providing opportunities for Australians to volunteer to live, work and learn in partnership with people of other cultures. Volunteers contribute to developing communities and bring a reciprocal benefit to Australia. Australian Volunteers International affirms that central to this purpose is the belief that all people should have access to resources to meet their basic human needs, the opportunity to achieve their potential, and a right to make decisions about their own development and to participate in the development of their own society.	Noted.
200303348: Conservation Council of WA	3, par 7-9	The draft does not adequately address the issue of population growth in Western Australia. This is an issue that must be addressed in a Sustainability Strategy. Neither is the issue of over consumption adequately addressed – in fact the draft implies there is little that we in Western Australia can do about the issue. This is clearly not the case. Active campaigns are required to reduce consumption in Western Australia. The Environmental Alliance submission to 'Focus on the Future' made a number of initiative suggestions about how this could be done.	Noted.

200303074: WA Sustainable Industry Group (WASIG)	2, p.16	Re: Vison, goals, priorities for section 4: The analysis presented appears still in its infancy, and does therefore not convince that the proposed priority areas for action are indeed the most pertinent ways in which Western Australia can make a difference towards global sustainability.	Noted.
	4, p.16	Against this background, the WA SIG has serious concerns about three of the proposed priority areas for action with regard to global contributions.	
		Population, Development Aid and Environmental Technology: it is unfortunate that the suggestion is created that poverty has to be addressed through development aid, and thereby is essentially a philanthropic undertaking. There is growing international consensus that business will have to play a lead role in eradicating poverty, as the challenges by far outstrip development aid and national capacity of developing countries	Noted.
		Responding to Greenhouse and Climate Change: in recognition for the fact that availability of 'modern energy services' is a principal enabler for development, the international discussion is moving away from 'responding to climate change' to 'providing quadruple A rated energy services' (i.e. Accessible, Affordable, and Acceptable (environmentally and socially) to the community, while maintaining 'Appropriate returns on investment' for investors in the energy sector).	Noted.
		Oil Vulnerability, the Gas Transition and the Hydrogen Economy: Two important transitional strategies for coping with oil vulnerability are not being addressed here: i.e. traffic minimisation and management (i.e. reduction of the per capita trips (personkilimeters) without compromising on ability to interact and experience diversity) and fleet fuel efficiency. Traffic reduction can be achieved through better planning and community development, which could be a spin off from initiatives under the sustainable settlements vision. Fleet fuel efficiency can be achieved through communication and marketing, tax incentives for fuel-efficient new cars, logbooks, etc.	This factors are addressed in the interim report of the Transport Energy Strategy Committee.
		Moreover it is regrettable that stationery energy (including coal, gas, oil and renewables) is not being addressed as a separate area for action, given the prominent role of the energy sector to support our current lifestyle and level of wealth in Western Australia.	See Sustainable energy.

200303443: State Development Portfolio	76	In considering these aspects of the report there is a need to recognise that there is a limit to what a State of approximately 2 million people can do to reduce population growth in a world of 6.2 billion people	Noted.
	79	WA should focus technological development efforts on areas of existing expertise and those areas of particular need and relevance to the future of the State. It is recommended that the Strategy investigates and reports on these priority areas in its final draft, for example these may include rehabilitation and restoration of mine sites and degraded lands, management of water resources – both surface and subsurface, and geological sequestration of carbon dioxide. The resources development sector in WA is already proficient in each of these areas, making them suitable candidates for further development.	The final Strategy notes particular areas of Western Australian expertise in relevant sections of the document.
200302729: Shire of Serpentine- Jarrahdale	5	Proposed Actions Integrate local government into the actions as a partner for developing countries. Action 2.5 proposes research between population and consumption, the key issues is consumption and the reasons for increasing consumption particularly in the first world. Extensive research into how to address this problem would provide developing countries the information and tools they need to address this issue before they are faced with the same problem of increasing consumption and the resultant loss of natural resources and inability to continue providing them at the required rate	Noted.
200303590: WA Collaboration	Rec. 22	Western Australian Council of Overseas Aid and Development Establish a Western Australian Council of Overseas Aid and Development, consisting of charities working in this area, relevant State Government portfolios (for example, Commerce and Trade, Education and Training) and universities to: • coordinate local initiatives in overseas aid and development;	This matter could be considered by the Sustainability Roundtable as part of its focus on contributing to global sustainability, including through overseas aid. See <i>Institutional change</i> .
		 coordinate state agency programs with aid and development programs; 	
		 coordinate State Government assistance to charities working on overseas aid and development; and develop a plan for responses to overseas emergencies that will assist in more coordinated responses from Western Australian organisations. 	

200303590: WA Collaboration	Rec. 23	Australia's contribution to overseas aid programs The Western Australian Government should strongly urge the Australian Commonwealth Government to increase Australia's contribution to overseas aid and development programs to a level equivalent to at least 1% of Australia's GNP.	This is reflected in the final Strategy. See Population, development aid and environmental technology.
200303076: WA Sustainable Industry Group (WA SEA)	9, p.7	Action 2.2: This proposed statement seems contradictory to the current Government action of closing Government Departments (ie. CASE) which was established to participate in developing renewable energy projects overseas which utilised Western Australian technology. WA SEA believes the focus should be on assisting private industry in participating in projects in developing countries. This work should not be undertaken by the pubic sector. But should be contracted via a competitive process to the private sector. Action 2.3: DoIT now resides within DoIR however, the roles of the Environmental Industries Unit appear to be intact. WA SEA believes that DoIR staff have a good track record and understanding of what is required to successfully stimulate business development. However DoIR will require a realistic funding	A number of State Government agencies are well placed to contribute to resolving global sustainability issues. The Global Centre for Sustainability is set up to facilitate such projects but will depend on private partnerships. Noted.
	p.14	commitments from the government to undertake this activity. WA SEA has concerns about the indicators listed in the Population section (Page 79) 'Number of global aid projects involving Western Australian government agencies.' (Page 79) 'Major overseas sustainability projects in developing countries conducted by Western Australian organisations and agencies.' (Page 79) CASE's role was to be involved in global aid projects and has since been shut down. It seems that Government policy is focused towards having Agencies involved only in a supporting role in any overseas aid work. This work should be left to the private industry. These targets should be revised or omitted. In addition, TAFE has been instrumental in developing and implementing renewable energy technology training courses overseas. This work should further be supported.	All indicators and targets have been removed from the final Strategy. Developing countries will often now allow developed aid projects unless they involve government. Partnership projects are the preferred approach. TAFE is part of the State Government and is an excellent example of such partnerships approaches.
200300358: F. Schnattler	Sec. 4.0, pg. 2	Assist businesses and non-for-profit organisations appropriately in order to win, or participate in, projects in developing countries.	Agreed.

200300358: F. Schnattler	Sec. 4.0, pg. 3	Promote Western Australian environmental products, services and technologies in global trade through an annual "McSustain Expo" in Perth. The "McSustain Expo" will be a biomass and non-biomass products and services expo tailored to suit BEvolution on the one hand, and research and science in environmental technologies on the other hand.	The final Strategy proposes the development of a 'Sustainable Living' festival that could support this proposal.
	Sec. 4.0, pg. 5		Noted.

Maintaining Our Biodiversity

CIB#	Submission paragraph/page #	Paragraph Text	Response
200217800: Michael Bell	20	2.14 - Research ways to stop, not limit marine pests, perhaps the use of filtered and tested ballast water would be a start.	The final Strategy includes the development of an Introduced Marine Pest Response Strategy to exclude pests that already occur in other parts of Australia or may be introduced from overseas.
200219280: City of Swan	34	More needs to be done in spelling out the indicators and targets (see page 84).	Noted. All indicators and targets have been removed from the final Strategy.
200300362: Wildflower Conservation Society of WA Inc.	6	The report is exceedingly anthropogenic and the ecology of the State has been given short shrift. For this reason, in this particular section we recommend that the reasons should be given as to why biodiversity should be included in a sustainability strategy, for example" • Instrumental values, including bio-prospecting; • Ecosystem services including clean air and water; • Intergenerational equity; • Intrinsic rights of other organisms; and • Aesthetic values.	The final Strategy more fully acknowledges the reasons why biodiversity is fundamental to sustainability. See Maintaining our biodiversity.
	7	The south west of Western Australia is one of the 25 most diverse regions in the world but this is only referred to fleetingly in the Strategy. The significance of the State's biodiversity should be more adequately addressed in the strategy.	See above.

200300362: Wildflower Society of WA Inc.	8	Proposed Action 2.13 "complete the Biological Survey of Western Australia" should be rephrased to "monitor the changes occurring in the flora, vegetation and fauna of the State by continuing the Biological Survey of the State". The threats to biological diversity should be addressed in the actions. Thus, another action should be to increase the funding for research and implementation of strategies to control fire, introduced weeds and feral animals. We need to fund a more effective programme aimed at preventing importation of new weed species that could threaten biodiversity in the future. The horticultural industry and the wider community need to be targeted in order to educate them about weed identification, introduction and control. There needs to be more funding into the effect of fire on flora, vegetation and fauna. While we have increased our understanding of the species whose survival is now threatened we should also support studies of how some native species have been successful in adapting to human induced changes. Other actions could address the fact that we have in the past been very forest-based in our policies and research; although important, this is only a very small area of the State. We need also to direct resources into other areas of the State to redress this bias. For instance, the decline of Banksia Woodland should be included in this refocusing of attention. Another area that needs addressing is the lack of mechanism by which landowners can declare that their land is being managed for conservation; this should be remedied. The indicators and targets for this section of the report need to include: • No more clearing of native vegetation in agricultural areas; • # of hectares of land rehabilitated through the State; and • Area of native vegetation preserved on private land managed for conservation.	The final Strategy includes a commitment to continue to carry out the on-going systematic regional biogeographic survey throughout Western Australia.
200300368: City of Kalgoorlie- Boulder	13	The maintenance of biodiversity is as much cherished by private individuals and philanthropist as by government departments, this needs to be recognised by State Government as of as much if not more importance than preservation of biodiversity by state institutions. The maintenance of bio-diversity by private individuals is one of the most highly taxed (eg: land tax) industries in Australia, this needs to be addressed at both a state and federal level, to ensure that our bio-diversity in both private and public hands is protected.	Noted.

200300368: City of Kalgoorlie- Boulder	14	Nature based recreation and tourism has many positive outcomes for all regions and areas. There should be an initiative introduced to assist private owners of vast properties to protect and capitalise on the biodiversity and 'sense of place' while keeping the property economically viable.	
200302865: Urban Bushland Council WA Inc	4	The key issues of	Noted.
	5	The section on biodiversity is remarkably weak and this is a matter of great concern to us. UBC believes it needs to be completely rewritten by persons with the appropriate expertise in the natural resource agencies. Biodiversity is in the chapter on global sustainability yet other issues such as aquatic systems and coastal and marine issues are in a different chapter on sustainable use of natural resources.	This section of the final Strategy was largely re-written by the Department of Conservation and Land Management. Biodiversity is also given increased attention within other sections of the document.
	12	Biodiversity is not just about protecting rare and endangered species. It is about protecting all natural remnants and ecosystem processes.	Noted.
	13	Other important strategic State initiatives such as Bush Forever need to be included.	Bush Forever is included in the final Strategy.
	14	Objectives on p 83 should include ending land clearing.	Noted.
	15	Objectives should link into the State's commitments under the National Biodiversity Strategy . An objective should be to meet the <i>national biodiversity objectives and targets</i> . This Government is a signatory (signed by the Minister for the Environment Hon Dr J Edwards) to these targets.	The final Strategy notes that the State has entered into agreements with the Commonwealth Government to address a number of international obligations including the Convention on Biological Diversity.
	16	It is nonsense to suggest that nature-based tourism can <i>enhance</i> biodiversity and this needs to be corrected.	The final Strategy emphasises the importance of conserving biodiversity on which nature-based tourism depends.

200302865: Urban Bushland Council WA Inc	17	The proposed actions should address the key threats to biodiversity: I land clearing Climate change changed groundwater regimes sailinity weeds feral animals including domestic and feral cats, foxes, goats, camels etc. The greatest threat to biodiversity is clearing. The UBC strongly believes that the loss from direct human removal and degradation on bushland and wetlands must be stopped. We believe the new Biodiversity Act should explicitly end the era of land clearing and change the focus to universal protection and support for management of bushland and wetlands. The approach was taken in South Australia in 1991.	The final Strategy notes the importance of identifying key threats to biodiversity and appropriate mechanisms for controlling or managing the impacts of these threatening processes.
	18	Many of the proposed actions imply substantial government funding. At present the whole biodiversity sector is grossly underfunded and a major shift in attitude toward funding is needed. Successive governments over the last 15 years have been steadily reducing funding of DEP, CALM and the conservation estate generally. Research and employment of technical experts such as Botanists and Biologists and other scientists has been squeezed below functional levels. The current government has cut departmental budgets and programs even more than predecessors.	Noted.
	20	The UBC disagrees with the "Global Opportunities" section. This is unrealistic and somewhat hypocritical when our own programs are incomplete and grossly under funded.	Noted.
200302880: City of Wanneroo	28	Local Government and community groups undertake and support significant bushland restoration works throughout the State. The development of a bushland restoration manual (similar to the Water and Rivers Commission's existing River Restoration Manual) collating and updating existing information may enhance the capacity of these groups to undertake this work. Active support should be given to these community groups to assist with environmental works.	
	29	The State Weed Plan and Environmental Weed Strategy for WA should be implemented with appropriate resources allocated to it.	Noted.
	30	There are several widespread and significant plant declines occurring throughout the State (eg Wandoo, Flooded gum and Tuart), with the causes of these being unknown. Appropriately funded research should be conducted into the causes of these declines to enable appropriate conservation measures to be implemented.	Noted.

200311216: Zoe Moore	31	The responses to WA's international biodiversity obligations have been occurring for some time? How can this possibly be true? The south-west region of WA has been identified as one of the few biodiversity hotspots in the world and the State government has not wavered from its mission to desecrate this area.	Noted.
	33	Token mention of Indigenous. Involvement. Why don't we instead try to learn from Indigenous people a way to live in harmony with our environment?	The final Strategy recognises the absolute necessity of involving and learning from Indigenous people in developing approaches for the future. See <i>Indigenous communities and sustainability</i> .
200302949: Green Skills	4 (of cover letter)	strongly recommend that the Sustainability Strategy include a section which endorses the concept of the International Biosphere Reserves, and calls on the WA State Government to develop a policy which facilitates local communities developing Biosphere Reserve proposals, and assisting them through the challenging process of getting such proposals nominated and accepted. (Green Skills has included information on Biosphere Reserves and their organization).	Noted.
200303065: City of Gosnells	30	The City supports the vision and objectives outlined, however it is considered that biodiversity in relation to aquatic ecosystems is not adequately addressed. Whilst it is acknowledged that aquatic ecosystems are dealt with in section 5 <i>Protecting Aquatic Ecosystems</i> , this section makes little reference to biodiversity.	The final Strategy has increased emphasis on the biodiversity values of aquatic systems.
	31	the following additional biodiversity indicator is suggested – "Number of threatened species and ecological communities remaining outside areas managed or set aside for the purpose of conservation".	All indicators and targets have been removed from the final Strategy.
200300089: Phil Thompson	16	"Biodiversity conservation is intimately linked to issues of population growth": Agreed, however the draft strategy does not appear to propose any action relating to population growth.	Noted.
200303162: Robin Chapple & Giz Watson, MLC's	2, p.5	Biodiversity is not given sufficient weight either in its value, decline and future prospects	The final Strategy has a separate section devoted to maintaining biodiversity and the biodiversity and ecological integrity is acknowledged as foundation principle of sustainability.
200303268: Diane Matthews	17	Weeds and feral animals are undermining sustainable management practises within Western Australia. It is absolutely abysmal that there is no weed science section within the Department of Conservation and Land Management (DCLM), or that the Herbarium cannot secure funding to complete its collection and reference library of weed species.	Noted.

200300363:	28	Local Government is particularly well placed and has the capacity to influence	Noted.
Eastern		land use activities to achieve conservation and maintenance of biological	
Metropolitan		diversity. Local Government can impose conditions on development and	
Regional		subdivisions relating to vegetation protection and the retention of bushland	
Council		linkages through their Town Planning Schemes.	
		For more effective decision-making on biodiversity, Local Government will need to	
		gain a better understanding of conservation values for local biodiversity occurring	
		in their areas. This is one of the key aims of the Perth Biodiversity Project, which	
		is a partnership project between WALGA and Councils in the metropolitan area.	
		At the regional level, the EMRC has been very active in assisting member Councils	
		to protect and manage their local biodiversity.	
		The National Local Government Biodiversity Strategy (NLGBS) has been	
		developed to assist Local Government be a key partner in biodiversity	
		conservation. The NLGBS supports regional partnerships and planning for	
		biodiversity conservation. This view should be supported by the State	
		Government and lead to additional resources and funding available to Local	
		Government to undertake biodiversity conservation activities.	
	31	Local Government should be a major stakeholder associated with the proposed	Noted.
		Biodiversity Conservation Act and Biodiversity Conservation Strategy (Action 2.7).	
	32	The EMRC supports the State's intent to facilitate nature based recreation and	Noted.
		tourism and Western Australia's sense of place (Action 2.9). The EMRC has	
		successfully undertaken this at a regional level and has developed a Regional	
		Tourism Strategy and an eco-tourism guide for the eastern region of Perth.	
	33	Our region is well placed to site the proposed Biosphere West Project (Action	Noted.
		2.11) given its natural attributes (Swan River, Darling Scarp and the Hills) and	
		the significant extent of declared rare flora, rare fauna, threatened ecological	
		communities and priority listed flora in the eastern metropolitan region.	
	34	Local Government and local communities have a lot of information and knowledge	Noted.
		to contribute toward the completion of a biological survey for Western Australia	
		(Action 2.13).	

200217800: Michael Bell	17	As we can't fulfill our present commitments to global treaties now, how do you suggest new initiatives are enforced ?	Noted.
	19	How can one branch of government (the E.P.A.) say that development should proceed at the Cape Range Ningaloo area, and another branch say that the area deserves World Heritage Listing? They seem to be opposing views!	Noted.
	22	Political factors should not influence power supply decisions.	Noted.
200215541: John McBain	P 7 par. 4	The latest research also shows the threat to biodiversity from continued logging – our forests belong to future generations and biodiversity is close to their hearts. There is immense future tourism potential in increasing the biodiversity of our forests, and also huge potential for increasing employment.	Noted.
200303069: Alcoa	2, p.7	We believe that the draft Strategy does not adequately recognise the significant contribution industry continues to make to biodiversity conservation, by providing resources, survey data, research, coordination and management strategies. In particular, we believe the draft Strategy should identify the need for government agencies to work in partnership with industry to ensure that government and industry biodiversity programmes are complementary and do not duplicate effort or a waste of resources.	The contribution of industry to biodiversity conservation is acknowledged in the final Strategy, particularly in Sustainable mining and petroleum production.
200303074: Department of Conservation and Land Management	Page 8, para 3 and 4	Despite its key role in meeting sustainability objectives, the maintenance of biodiversity comprises a very small component of the overall Strategy Being a foundation principle for sustainability, the maintenance of biodiversity should come across strongly in the Strategy and be a principle guiding other priority areas. The linkages between biodiversity conservation and sustainability also need to be clearly defined; identifying the benefits of maintaining biodiversity, and allocating objectives and action items accordingly. It is recommended that at the very least, the priority area <i>Maintaining our Biodiversity</i> , be retained as a section committed to the recognition, protection and conservation of the State's biodiversity values.	This is reflected in the final Strategy.

200303074: Department of Conservation and Land Management	Page 8, para 5	On page 81, the draft Strategy lists the projects that are being carried out in Western Australia according to its international biodiversity obligations. The State's contribution to the Millennium Seed Bank Project for flora conservation, of the Royal Botanic Gardens, Kew, south of London, should be recognised in this list. Already the State has contributed seeds to the project from a number of poorly known species as a cooperative effort from this Department and the Botanic Gardens and Parks Authority.	This has been incorporated into the final Strategy.
	Page 8, last para and page 9, first two paras	In the priority area <i>Maintaining our Biodiversity</i> , the draft Strategy identifies an indicator/target as "Number of threatened species and ecological communities brought back from the edge of extinction". It is noted that there is no supporting objective or action designated to the protection of threatened species and communities. It is fundamental that consistency be maintained between objectives, actions and targets in the State Sustainability Strategy. It is pointless to identify a target for the recovery of threatened species and communities, without allocating an objective or any action items. Furthermore, this target is largely unquantitative and vague. It is difficult to define and measure "edge of extinction", making the phrase inappropriate as a target or indicator. This Department prepares and carries out recovery plans for high priority threatened species and ecological communities. This should be recognised in the Strategy, and proposed action items allocated to build upon the actions that are already underway, such as "develop recovery plans for all listed threatened species and identified threatened ecological communities". A more appropriate target may be similar to "rate of recovery of threatened species and ecological communities covered by recovery plans compared with predicted rates", which is both specific and measurable.	All indicators and targets have been removed from the final Strategy.
200303425: Fire and Emergency Services Authority of WA	1, pg. 5	To improve the protection of the environment and maintain biodiversity there needs to be greater access to research funding that is targeted to obtaining information on fire and its impact on biodiversity for all the bioregions in WA. FESA has sought research in WA through the Bush Fire CRC and is actively seeking partners to obtain commonwealth funding. In virtually all cases there is a requirement for Agency seed funding that will be matched either in part or fully by the Commonwealth. Without that seed funding there is no opportunity to fill knowledge gap.	Noted.

200303160: Goldfields Esperance Development Commission	Pg. 5	Eco-tourism and eco-prospecting are increasingly becoming more popular in regional WA and should be encouraged and supported. Institutions such as the Centre for the Management of Arid Environments (CMAE) located in Kalgoorlie-Boulder encourage research and development of biodiversity in our region. Our region is very diverse ecologically and the sustainability off our ecology will be of increasing importance in the future. The remote location of the region's rangelands where some of our communities are located means that monitoring and conservation activities rely predominantly on people already there to maintain them, such as pastoralists and mining companies. Centralised government agencies will find it increasingly difficult to undertake work in the rangelands when their "volunteer" or defacto workforce reaches crisis point. Ensuring communities located in the rangelands are sustainability is vital to the future of our natural, economic and social future. Assisting pastoralists wishing to remain on the land and diversify are also issues.	These matters are address in the final Strategy, primarily in Sustainable rangelands management.
200304005: Marine Parks and Reserves Authority	10	Overall Vision statement (p83): this statement is very wordy and should have been simplified; also it appears to relate to terrestrial biodiversity only. Biodiversity conservation should include all types of biodiversity, including the geodiversity it is dependent upon.	The vision in the final Strategy includes reference to terrestrial, freshwater, estuarine and marine conservation reserve system.
	11	In the second objective (p83) "marine parks" should read "marine conservation reserves" or "marine reserves" to allow less restriction, as in WA marine parks are one on type of marine protected area.	This is reflected in the final Strategy.
	12	2.10 should include a marine and estuarine component. It is sadly lacking at present.	This is reflected in the final Strategy.
	13	First dot point: delete "the extent to". As a target we should aim to have such a system established and then monitor the extent as an indicator. Should also add "integrated terrestrial, freshwater, estuarine and marine" between "representative and "conservation". WA is well forward with establishment of a terrestrial system and is well behind with the rest. • Establish a comprehensive, adequate and representative integrated terrestrial, freshwater, estuarine and marine conservation reserve system for WA within 20 years. Monitor the extent of establishment and review as an indicator.	All indicators and targets have been removed from the final Strategy.
200303224: Minister McHale	7	Biodiversity should be addressed under both the chapters on <i>Global Sustainability</i> and <i>Sustainable Use of Natural Resources</i> .	Biodiversity is addressed specifically in <i>Maintaining our biodiversity</i> and more generally throughout the Strategy.

200303443: State Development Portfolio	81	This section of the Strategy (p.80) would benefit from a discussion of the various measures that can be utilised to assist in biodiversity conservation. These include the adding of value by creating trading or property rights over certain resources (e.g. fish and water trading rights and as suggested in the text (p.83) "especially in health"). This would also require additional material focussing on strategies for the monitoring and enforcement of these rights. There should be reference to the intent of the proposed Biodiversity Conservation	This has been addressed in the final Strategy.
	85-86	Act, which addresses protection of species and their ecosystems. The Strategy should clearly acknowledge that effective land use planning and management is essential to protecting Western Australia's biodiversity. Ongoing progress in such areas as land rehabilitation and habitat restoration by the resources sector should be welcomed in the Strategy. It should be recognised that in some land use areas such as pastoral lands, there are ecosystems that are so degraded that without large investment, it will be impossible for them to recover.	This is reflected in the final Strategy.
200303416: Quinns Rocks	3, p.2	Act to protect WA's biological diversity by ending land clearing (including clearing for urban development), tackling weeds and feral animals and supporting conservation efforts in and outside reserves. The proposed Biodiversity Conservation Act and strategy (action 2.7) should be a priority.	Noted.
200303350: Graeme Olsen	5, pg. 16	(Section is) too short to offer more than a glimpse at each issue. Each of these large complex issues deserve better than the truncated treatments presented in the draft Strategy.	Existing government documents and processes offer more comprehensive treatments on a range of issues, including biodiversity.
	6, pg. 16	Where a number of issues are discussed, they are often not placed in context, or their relative importance and applicability are not adequately explained. Major and minor issues are treated with equal gravity, and no attempt is made to set priorities.	Noted.
	7, pg. 16	Many obvious strategic questions are ignored. For example, what is the appropriate strategy for dealing with a public asset such as biodiversity when the land management practices that are threatening it are controlled by private interests subject to a wide range of commercial, social and environmental pressures?	Noted.
	8, pg. 16	In many areas there is a lack of analysis leading up to conclusions. Perhaps this analysis has been done elsewhere, but a summary of the logic behind each conclusion should be presented here.	Noted.

200302729: Shire of Serpentine- Jarrahdale	6, pg. 9	The role of local government in not mentioned at all in this section on maintaining biodiversity. Local Government throughout the State, and worldwide, has played a significant role in biodiversity protecting and enhancement through a range of initiatives including Landcare, conservation zones, planning policies	The final Strategy recognises the involvement of Local Government in a range of sustainability initiatives, including for example, the Perth Biodiversity Project. See <i>Partnerships for action</i> .
	7, pg. 9	Objectives There is valuable biodiversity within private ownership and this needs to be addressed in the objectives. Develop a framework and incentives to encourage private land owners to maintain and enhance biodiversity rich areas on their land. The Shire of Serpentine Jarrahdale offers a 50% rate reduction to landowners for establishing a conservation zone on their land in areas of rich biodiversity. Another objective should be to co-ordinate the sharing of knowledge which already exists within the many agencies and bodies within WA.	The final Strategy emphasises the involvement of private landowners in supporting the protection of biodiversity. See for example the vision statement in <i>Maintaining our biodiversity</i> and the Box on 'It's 'Gnow' or Never' and 'Wildcountry: Gondwana Links'.
	8, pg. 9	Proposed Actions Establish guidelines for local government to implement to encourage and reward protection of biodiversity on private land.	This could be considered as part of the development of the State Biodiversity Strategy.

Responding to Greenhouse and Climate Change

CIB #	Submission paragraph/page #	Paragraph Text	Response
200300298: Information for Action	7	In the Netherlands, 70 percent of people go to work by bike. In Western Australia, we have the flat terrain and the perfect climate for cycling but we have adopted the car as our mode of personal travel. In WA last year there was a 1.6 percent increase in the number of licensed drivers (1.293 million drivers in total) and a 2.2 percent increase in the number of licensed vehicles (a 39, 000 vehicle increase in the past 12 months). The Dutch have chosen a very low polluting means of transport as a leading option and set up the facilities and laws to support cycling. In some Canadian and European cities, 25 percent of trips are on public transport. The Australian figure is 3-8 percent.	Noted. The final Strategy acknowledges the importance of bikes as a mode of travel. See <i>Integrated land use and balanced transport</i> .
200300368: City of Kalgoorlie- Boulder	15	The City of Kalgoorlie-Boulder, along with a number of Western Australian Local Governments Authorities have become involved in the Cities for Climate Protection Programme $^{\text{TM}}$, in order to reduce greenhouse gas emissions. This will as an aside assist in the reduction of spending on energy consumption. Further assistance is required to Councils to ensure the adoptions of programmes such as the CCP $^{\text{TM}}$ are adopted.	Noted.
200300089: Phil Thompson	17	Vision: "stabilised population growth".: This is presumably referring mainly to global population growth, but should also refer to population growth at all levels (see 11. above). There should be indicators included regarding population growth.	Noted. All indicators and targets have been removed from the final Strategy.
200300140: Wetlands Conservation Society Inc.	6	The sections on greenhouse and population are very disappointing. These are areas where the Government is refusing to face up to the hard questions. In both cases we need specific policies with targets and measures. We cannot simply go on ignoring these issues because they directly affect all of the other issues in the draft. Population and greenhouse are probably the most difficult issues to address because they affect everyone and to tackle them we need to make major lifestyle changes. This is something that no democratically elected Government likes to do. However to ignore these issues is untenable because they will undermine the Strategy itself. The lack of detailed policies on population and greenhouse is in stark contrast to the detail on other major issues.	The Government is currently developing a Western Australian Greenhouse Strategy.
200301111: Subiaco Bicycle User Group	46	Actions to respond to oil supply vulnerability and greenhouse emissions omit specific actions to encourage cycling and walking, surely the most oil efficient, non-polluting and sustainable forms of transport. Work place reforms could also foster these transport modes.	The final Strategy contains actions that support cycling and walking Integrating land use and balanced transport.

200300357: Water Corporation	35	On page 86, the Kyoto Protocol is discussed with some optimism. However, the Kyoto Protocol has yet to be ratified. Australia has signed the Protocol, but has yet to ratify it. It is understood that the Australian Federal Government has said that it will not ratify the Protocol unless or until the US does and the US has since publicly announced that it will not do so. As 'ratification' of the Kyoto Protocol requires the ratification of 55% of countries involving 55% of global emissions, such ratification depends on countries such as Canada, Russia and Japan, some of which have not yet committed to ratification.	Noted.
	36	Similar optimism is shown by the announcement that the Western Australian Greenhouse Taskforce is preparing a WA Greenhouse Strategy. A draft WA Greenhouse Strategy was prepared by the Executive Officer to the (then) WA Greenhouse Council in 1999, but was not adopted. A contract was then let to a consultant to prepare such a strategy and finally a group of relevant WA Government CEO's also tried to prepare a Strategy – without success. As a WA Greenhouse Strategy relies on key commitments for action from Government (with a significant cost implication), such a Strategy will not be forthcoming until such commitments are made.	Noted.
	37	Greenhouse mitigation projects will have no status until the above issues are dealt with. This is an example where institutional aspects will limit the full values of GHG mitigation projects developed by the Water Corporation.	Noted.
	39	Proposed Action 2.15 (page 87) suggests the establishment of a voluntary program of Greenhouse Offsets to assist large development projects to reduce GHG emissions by investing in energy efficiency, renewable energy, carbon sequestration etc. It is the experience of the Corporation that membership of the Greenhouse Challenge could be supported in the Strategy, as it promotes these initiatives and also provides for members to set greenhouse gas emission reduction targets and to publicly report on them on an annual basis, using a common and scientifically robust mechanism.	This matter could be considered in the preparation of the Western Australian Greenhouse Strategy.
200217800: Michael Bell	21	2.18: Commit to changing the Government fleet to Gas powered vehicles	The final Strategy indicates that the Government will adopt a revised government vehicle fleet policy to increase the use of 4 cylinder vehicles and significantly reduce fuel consumption and CO2 emissions and continue the use of LPG powered vehicles where appropriate.

200215065: Graham Chittleborough	13	These days, some politicians extol the value of carbon sequestration plantations; carbon rights legislation and carbon credits trading. While seeming attractive commercially, carbon credits from tree planting may very well prove to yield mainly a spurious confidence that effective measures are in place to restore sustainability. The failure of carbon credits is partly due to the fact that carbon sequestration by trees is only temporarily effective during their earlier years. But of far greater significance (and most often overlooked) is the fact that marine carbon sinks remove more than ten times as much excess carbon dioxide in the atmosphere than that taken up by vegetation sinks on land. As pointed out in my book "Shouldn't Our Grandchildren Know?" (Fremantle Arts Centre Press, 1992), if one or two of the vase marine sinks for carbon dioxide should fail (& the signs are already evident), such feedback loops will set up a runaway increase of atmospheric carbon dioxide, accelerating climate change and outstripping any of the carbon benefits of planting on land.	Noted.
	14	Tree plantings do have other real benefits; let's not exaggerate their success as permanent major carbon sinks.	Noted.
200218809: ICLEI		Reference to local govt involvement in greenhouse issues; but no particular response to proposed actions. Discusses Cities for Climate Protection Program.	Noted.
200219175: City of Armadale	63 & 64	Reference to higher cost of renewable energy compared to non-renewable. No particular response to proposed actions.	Noted.
200301136: Garry Baverstock	13	There is a tendency for the document not to define the role of passive, active uses of solar energy in a sunny state like WA. There are enormous industrial and professional opportunities for the export market if there was a more defining proactive approach for promoting solar energy development and use. Perth has a very important role in this field in the first half of the 21 st Century.	Noted.
	14	I recognise that it is covered briefly, but the setting of targets of 25% use over the next 30 years, would be welcomed and would set a global benchmark for other countries to the north of use to emulate. The document needs greater focus and emphasis on this area.	Noted.
	15	Further development of the Strategy could be explored in conjunction with WASEA, ANZSES, ISES, technical resources through Murdoch University, the RAIA and Institute of Engineers. Large industry lobbies should not have free reign of progress in this important visionary process.	Noted.

200302865: Urban Bushland Council WA Inc	21	The UBC believes this section is hopelessly inadequate and needs rewriting. There is no basic data on current WA emissions or past emissions. Audits and estimates of emissions have been conducted in early 1990's, mid 1990's and more recently and this information has been presented. We believe WA has had the highest per capita increase of $\sim 50\%$ in emissions since 1990. WA greenhouse emissions are an extremely serious problem and they must be addressed.	The Government is preparing a Western Australian Greenhouse Strategy.
	22	Land clearing. The response should include an immediate end to land clearing.	Noted.
	23	The response should include the end to use of coal fired power stations and immediate mandatory energy efficiency measures across all sectors.	Noted.
200302880: City of Wanneroo	31	Support to assist all Local Governments to undertake Greenhouse Gas Reduction programmes should be considered.	Noted.
	32	The State Government should acknowledge that Australia should ratify the Kyoto Protocol and promote this with the Federal Government. This position should be endorsed in Policy. The State Government should also adopt a role in assisting and equipping Local Government and the broader community, with better information and resources to advance in unison on such initiatives. For example a hydrogen economy conference for Local Government and the broader community may empower the early delivery of the objectives sought by the State Government.	The final Strategy notes that a Federal Government system consistent with global standards will be required to truly encourage this process. See Responding to greenhouse and climate change.
200311216: Zoe Moore	34	What about halting deforestation? And committing to Kyoto?	Noted.
200302959: City of Fremantle	15	Proposed action 2.15 should be changed to "Establish a mandatory program of greenhouse offsets to assist large development projects to reduce greenhouse gas emissions by investing in energy efficiency, renewable energy, carbon sequestration or other accredited projects in Western Australia".	Noted.
	16	Proposed action 2.18 should be changed to "Investigate and implement systems and programs to reduce greenhouse gas emissions for different vehicle fleets and electric train systems".	Noted.
	17	Proposed action 2.21 should also include a provision to identify funding requirements and responsibilities for adaptation measures, now and into the future.	Noted.

200303065: City of Gosnells	32	The City supports the vision and objectives, however the proposed actions seemingly omit the land clearing issue, which, although dealt with in a different context elsewhere in the document, should be listed as a significant contributor with appropriate proposed action(s).	Noted.
	33	Proposed actions should also include community initiatives, from direct action to education. These may be elements of the State Greenhouse Strategy, but are considered significant enough to be listed.	Noted.
	34	Proposed actions fail to take account of the significant economic opportunities, both local and global (see objective) available through the development of technologies and other marketable commodities. Proposed Actions must include a focus on R&D, thereby offering the potential to "participate in new global opportunities". Specific reference must be made here to the withdrawal of Commonwealth funding to Australian Cooperative Research Centre for Renewable Energy (ACRE), based at Murdoch University.	Noted.
	35	Proposed actions, indicators and targets must include monitoring and reporting of the State's greenhouse gas emissions.	All indicators and targets have been removed from the final Strategy.
200218809: ICLEI	8	Local government leaders have been active advocates for local implementation and have demonstrated what can be achieved through appropriate goal setting, strategic action and overall implementation.	The involvement of Local Governments in the Cities for Climate Protection program is acknowledged in <i>Partnerships for action</i> .
	18	ICLEI has created a performance base Milestone methodology demonstrating successful triple bottom line (TBL) results. Its quantification methodology developed by ICLEI's Australian Technical team is thorough, transparent and has provided results for direct use by the AGO.	Noted.
	19	The CCP™ methodology provides a simple, standardised way of acting to reduce greenhouse gas emissions and of monitoring, measuring, and reporting performance. ICLEI has developed software that considerably eases the analytical work involved and permits standardised, quantitative comparisons among different cities within individual countries and across the globe.	Noted.
	24	CCP™ is a program which clearly demonstrates the multiple benefits that accrue from greenhouse abatement including improvement in air quality, sustainable transport and reduce traffic congestion, efficient energy use, regeneration of biodiversity through sequestration, local economic development and job creation.	Noted.

200300363: Eastern Metropolitan Regional Council	35	The State Sustainability Strategy needs to clearly identify the relationship with the National and State Greenhouse Strategies. The strategy also needs to clearly set a target for greenhouse gas emission reduction and undertake dedicated action to achieving this target.	The Government is preparing a Western Australian Greenhouse Strategy.
	36	The State should also take a lead role in engaging non-government organizations such as industry and community in its effort to reduce greenhouse gas emissions and not solely focus on government activities.	Noted.
	37	The strategy should also consider other impacts from increasing greenhouse gas emissions. Climate change is only one and other equally important issues such as greenhouse gas and its interaction with other natural resource issues (ie. extinction of species) needs to be carefully considered.	Noted.
	38	There is considerable scope for reducing greenhouse emissions from the government vehicle fleet and already existing knowledge of how this can be done such as simple changes of using smaller more fuel-efficient vehicles. No further 'investigations' are considered necessary (Action 2.18) and it is considered more appropriate to constructively work towards positive and committed actions that lead to change.	The final Strategy includes a commitment to adopt a revised Government vehicle fleet policy which will reduce CO2 emissions.
200300363: Eastern Metropolitan Regional Council	35	The State Sustainability Strategy needs to clearly identify the relationship with the National and State Greenhouse Strategies. The strategy also needs to clearly set a target for greenhouse gas emission reduction and undertake dedicated action to achieving this target.	Noted.
	39	'Maintaining the commitment' to ensuring that greenhouse is a significant factor in power decisions (Action 2.19) is not considered appropriate as the current level of decision making to support sustainable energy are inadequate. While it is recognized that there is a shift toward sustainable power sources, the rate of change is inadequate and a more positive and direct action is required to progress sustainable power and renewable energy. Expansion of existing coal power stations is not 'maintaining a commitment' to this view. It is recommended that a task force be set up to identify ways to improve the "take up' of sustainable and renewable energy initiatives and opportunities to achieve greater efficiencies with existing infrastructure. This task force should involve Local Government, particularly those involved in the Cities for Climate Protection (CCP) program who require more support from government corporations such as Western Power.	Noted.

200300363: Eastern Metropolitan Regional Council	40	The provision of mechanisms in the electricity market for encouraging renewable energy and distributed generation (Action 2.20) is supported and should be considered further in the taskforce mentioned above.	Noted.
200303062: Andrew Thomson	1	This document is a farce. The key issues immigration and rapid population growth (p75) in Western Australia are completely ignored and climate change received scant attention. The fact that Australians produce more than 27 tonnes of CO2 per head, the highest in the world was not even mentioned. India uses less than one tonne of CO2 per head (Clive Hamilton Running from the Storm).	Noted.
200306829: Phillip Calais	1, p. 5	Ensure the government vehicle fleet and the electric train system are greenhouse neutral by purchasing equivalent carbon credits from Western Australian carbon sequestration projects. This is a very commendable policy – but has anyone actually worked out how many carbon credits this will be?	Noted.
	3, p. 6	Purchase green power with the aim of 10% in the next financial year, 20% by 2005, 30% by 2010 and 50% by 2020. Once again, I think that this is a commendable step to take, although there are problems with green power tariffs. For example, it has been argued by some that the green power premium tariff is inequitable as green power customers pay more that others yet receive no actual benefit in doing soRather, all users of electricity, on any tariff, benefit equally. It is a case of the non-polluter pays, rather than the polluter pays principle.	Noted.
200303162: R. Chapple & G. Watson, MLC's	2, p. 5	Climate change - one of the most serious issues we face goes virtually unremarked in the strategy.	This will be addressed through the Western Australian Greenhouse Strategy.

200303069: Alcoa	1, p.6	The draft Strategy addresses global climate change for Western Australia primarily by proposing a number of options for implementation that we believe are both narrow and too selective. Specifically, the draft Strategy implies that the Kyoto Protocol provides the only path for implementing the UNFCCC. However we believe that this limited option overlooks the need and opportunity for alternative and multiple approaches to achieve more comprehensive change in both the domestic and international markets. In particular, we believe the draft Strategy should address the broader role that Western Australia has to play in contributing to the Australian effort on greenhouse reduction, rather than acting separately.	The Government is preparing a Western Australian Greenhouse Strategy.
	2, p.6	While a broad range of options and actions are available to Western Australia, the draft Strategy focuses on activating only a limited number of selective, and therefore narrow, actions to address climate change. In particular, the use of carbon accounting, carbon sequestration and carbon rights accreditation to encourage alternative energy strategies is still subject to the development of robust measurement techniques, verification methodologies and international agreement (which will not be achieved until at least 2005), and ignores the wider opportunities that exist in the current innovation and technological developments.	The Government is preparing a Western Australian Greenhouse Strategy.
	3, p. 6	Further, we believe that the possibility of introducing covenants (such as we have seen in Victoria), a mandated program of greenhouse offsets or any form of emissions trading or energy tax scheme may introduce further market distortions and result in discrimination and loss of competitiveness for larger projects in the international marketplace. Inevitably, this may result in inter-state competitive imbalances and a loss of investment potential for the Western Australian economy, as opportunities for investment elsewhere become more attractive.	The Government is preparing a Western Australian Greenhouse Strategy.
	4, p. 6	Finally, the global climate change issues highlight the need for energy market reform in Western Australia Alcoa believes these actions proposed are fundamentally flawed, as they would result in discrimination and a significant distortion of the electricity market, thereby resulting in a loss of competitiveness. We believe that further efforts should concentrate on the reforming the electricity market in Western Australia to increase competitiveness, removing the barriers to alternative energy source selection and promoting the use of both cogeneration and renewable energy sources in the context of the Australian Government initiatives.	This is reflected in the final Strategy. See Sustainable energy.

200303074: Department of Conservation and Land Management	Page 9, para 3	The link between the Sustainability Strategy and the WA Greenhouse Strategy, which is also in preparation, would be clarified and strengthened if the structure of this section was parallel to that of the Greenhouse Strategy. Such a parallel structure is suggested at the beginning of the section, in which the highlighted text immediately below the title (page 86) states the focus of the four content elements of the Greenhouse Strategy. It would be useful to continue allusion to these elements throughout the section, and reference to the process elements	This has been addressed in the final Strategy.
		(government leadership, national and international policies, research and community and awareness) might also help create links between the Strategies.	
	Page 9, para 4 and 5	 With regard to the specific actions proposed in this section in the draft Sustainability Strategy: 2.17: It would be appropriate to broaden the discussion of a carbon sequestration facility beyond the Forest Products Commission to ensure that carbon sequestration by any Government Department is recognised and can be applied to promote effective and appropriate environmental and community outcomes. 2.21: A climate adaptation strategy must address the conservation needs of natural systems, but must also go well beyond this to address health systems, water supply systems, public and private infrastructure, agricultural and plantation activities and a range of other matters. Regarding the detail of this particular proposal, it would be appropriate to remove reference to the CSIRO Healthy Country initiative. This section would be considerably strengthened by ensuring that there was at least one effective action and useful indicator for each major element of the Greenhouse Strategy. 	Noted.
200303443: State Development Portfolio	87 & 89	This section tends to focus on new initiatives and concepts to reduce greenhouse emissions without providing sufficient direction in dealing with present day greenhouse abatement. Incorporation of current measures into the Strategy would be valuable. It should also be acknowledged that Western Australia emits a small proportion (0.2%) of world emissions. While WA should endeavour to reduce greenhouse emissions to the greatest extent practicable, this should not be out of proportion to the State's ability to abate emissions and maintain sustainable development. To do otherwise will likely have severe impacts on future growth of the State, which is require to maintain expected standards of living.	Noted.

200303350:	17, pg. 2	These sections lack breadth, failing to discuss a sufficiently wide range of options.	Noted. The Government is preparing a
Graeme Olsen		The information presented generally follows a discernable "party line", and does not recognise or discuss alternative viewpoints where these conflict with it. This is	Western Australian Greenhouse Strategy.
		particularly strange when dealing with topics such as energy and greenhouse,	Strategy.
		where views different from those presented in the draft Strategy are held by a	
		large number of diverse and credible people and organisations. These are easily	
		accessible on the Internet and in published journals and reports. For example, a	
		laypersons guide to the range of opinions on these issues is provided by Deloitte	
		Research (2001). To ignore alternative views completely is a subversion of the process of developing a credible sustainability strategy.	
200302729:	2, pg. 10	The proposed action 2.15 is a voluntary greenhouse offsets program to assist	Noted. The Government is preparing a
Shire of	_, , , , ,	large developments. Large developments should have mandatory greenhouse	Western Australian Greenhouse
Serpentine-		requirements which will have far reaching benefits for WA. In time these can be	Strategy.
Jarrahdale		implemented for all developments. Larger developments have the capital to allow	
	3, pg. 10	for innovative solutions to achieve greater greenhouse reductions. Action 2.16 should be expanded to include a review process to ensure that	Noted.
	3, pg. 10	requirements are tightened every few years gradually lifting the minimum	Noted.
		standard.	
	4, pg. 10	Action 2.18 has to investigate the potential for all government fleet to reduce	The final Strategy includes a
		greenhouse gas emissions. This is very weak, if the government is serious about	commitment to adopt a revised
		setting an example they should set a quantitative target such as having all government fleet vehicles using sustainable fuels or fuel efficient (eg Toyota	Government vehicle fleet policy which will reduce CO2 emissions.
		prius) by 2010. Within this time frame all vehicles will have been replaced and as	Will reduce CO2 emissions.
		each one is replaced that could be changed to LPG or fuel efficient vehicles.	
	5, pg. 10	Global Contribution	Noted.
		If Australia doesn't sign Kyoto the possibility of Carbon Rights trading won't exist	
		for Australia as we won't be able to establish a market.	
200303590:	Rec. 12	Greenhouse gas emission reduction commitments	The Government is preparing a
WA		The State Government should commit to ensuring Western Australia makes its	Western Australian Greenhouse
Collaboration		proportional contribution to enable Australia to meet its Kyoto Protocol Targets	Strategy.
		for greenhouse gas emissions. This should include completing, funding and implementing a comprehensive State Greenhouse Strategy. The State	
		Government should also urge the Australian Commonwealth Government to ratify	
		the Kyoto Protocol.	
		In order to achieve this, future developments of the Western Australian economy	
		should not be skewed towards energy intensive industries. Equal policy priority	
		should be given to less greenhouse intense, economic growth sectors, such as the	
		services sector of our economy.	

200303076: WA Sustainable Industry Group (WA SEA)	3, p.8	WA SEA believes this section should focus more towards renewable energy and energy efficiency as a mechanism for reducing greenhouse emissions.	Noted.
	6-7, p.9	2.18: Recommend wording be changed to read ' Reduce the potential for reducing greenhouse gas emissions for the government vehicle fleet'	Noted.
		 2.19: This proposed action could be further strengthened and be reworded to read: 'The development and implementation of Government policies which support the application of sustainable energy technologies as a proactive means of reducing GHG emissions.' There needs to be: Greenhouse targets set for each sector Renewable energy generation targets set by each sector Government targets to be established 	Noted.
	1-4, p.9	Action 2.20: Without a workable renewable energy access regime the private sector will not be able to leverage the opportunities afforded to it by the Federal Governments MRET legislation. As a consequence, jobs and opportunities for GHG reductions, particularly in the agricultural sector, will leave the State. While some of the improvement proposed under the current electricity reforms are in line with <i>Proposed Action 2.20</i> such as, an interim renewable energy access regime and the requirement on electricity retailers to purchase a percentage of their electricity from renewable energy generators, other proposals will act against this Action. For example, the implementation of a single line use charge will reduce the incentive for dispersed generation and the maintenance of the uniform tariff will similarly stop the implementation of sustainable energy options for the remote grid / end of feeder. These recommendations that are detrimental and need to be identified and justified in terms of the stated Greenhouse goals. Other strategies currently in place such as barring renewable energy from participating in the power procurement process also discriminates against the adoption of sustainable energy and acts to maintain the status quo. This process needs to be modified to allow sustainable energy practices to participate in the procurement of the states long term energy requirements. Also the favouring of large scale coal fired power stations, within the power procurement process acts to reinforce an electricity network that is not conducive to the introduction of sustainable energy solutions as they can't operate in a manner that allows the integration of variable sustainable energy generators. This issue needs to be examined and addressed in the power procurement process.	Noted.

200303076: WA Sustainable Industry Group (WA SEA)	1, p.15	 WA SEA recommends that the additional indicators to be included in the Greenhouse section. (Page 88) Number of government departments that purchase renewable energy from ORER accredited generators Number of GWh of renewable energy purchased by Government Departments Greenhouse gas emissions savings resulting from the purchase of renewable energy 30% reduction of greenhouse gas emissions in all Government Departments by 2010 Targets established should be consistent with targets established by the WA Greenhouse Taskforce. 	All indicators and targets have been removed from the final Strategy.
	p.17	WA SEA believes that Albany is not a good example as this wind project uses overseas technology. A better example may be the activities of local manufactures	Noted.
200303354: Western Power Corp	11	As energy is fundamental to the State's economic activity and is the largest sectoral contributor to the State's greenhouse gas emissions, it is logical to expect strategic attention to energy in this and the following chapter (Sustainable Use of Natural Resources) of the draft Sustainability Strategy. However, the present treatment is not strategic in that, in Chapter 4, it highlights a few immediate actions (apparently unsystematically developed) and then jumps to consideration of a specific long term issue (transition to a hydrogen economy), and in Chapter 5 it is not considered at all.	Noted.
200219116: Wheatbelt Development Commission	17	No mention of an increase in renewable energy for WA. Currently Western Power is required to produce 2% of its energy from renewable resources by 2010. If the State is serious about sustainability, surely greater emphasis on renewable power generation should be included in such a strategy.	Noted.
200300358: F. Schnattler	Sec. 4.2, pg. 3	What is the factual name of the new carbon rights legislation?	Carbon Rights Act 2003

200300358: F. Schnattler	Sec. 4.2, pg. 3	Tax incentives for fuel-emission-free vehicles, eg. 6 months GST-free shopping.	Noted.
	Sec. 4.2, pg. 5	Maintain the commitment to ensuring that greenhouse gas emissions are a significant factor in power decisions, and legislate this commitment within two years, that is by the end of 2005.	

CIB#	Submission paragraph/page #	Paragraph Text	Response
200300306: Western Australian Bicycle Committee	4	The Final strategy needs to challenge the assumptions about the future availability of oil and natural gas; the latter in particular, as it seems that the WA public acknowledges the reduction in oil availability but not natural gas.	Noted. This matter is considered in the interim report of the Transport Energy Strategy Committee.
200300368: City of Kalgoorlie- Boulder	16	Proof of the viability of a hydrogen economy is needed prior to this been seen as a real alternative to the present oil based economy, particularly in remote areas where access and transport of conventional fuel sources is seen as more reliable.	Noted.
200215065: Graham Chittleborough	16	Incidentally, within Chapter 4 of the Draft Strategy, the glowing promise for future energy, the Hydrogen Economy – is presented as if this will resolve all our present problems of climate change due to emissions from fossil fuel energy. That glosses over further potential problems such as the recent discovery that hydrogen escaping to the ozone layer can catalyse the breakdown of ozone, further eroding the ozone shield, allowing more ultraviolet radiation to penetrate to the Earth's surface. Another case for applying the Precautionary Principle?	Noted.
200302880: City of Wanneroo	33	To assist the transition from the oil based economy, support for research into alternative fuels should be encouraged.	See the interim report of the Transport Energy Steering Committee.
200303055: City of Nedlands	11	There is no mention of alternative sources of power (biomass, wind, solar, nuclear). The report focuses on petroleum and LPG as a possible alternative, yet both of these fuel types are finite in terms of supply and produce greenhouse gases. Appropriate actions for this section should include research funding and subsidies into alternative energies, coupled with reductions of subsidies for cars and petroleum-using modes of transport.	See the interim report of the Transport Energy Steering Committee and Sustainable Energy.

200218008: Wren Oil	5	to include and promote re-refined oil as a renewable energy source in the "WA State Sustainability Strategy" in line with a recent submission to the Federal Office of the Renewable Energy Regulator concerning re-refined oil and the Mandatory Renewable Energy Target (MRET) in Australia. The MRET issue and re-refined oil will be raised when the Renewable Energy Regulations are reviewed in Canberra January 2003. Such changes will provide an incentive for the power stations to use recycled oil and create a use for a recycled product.	Noted.
200303065: City of Gosnells	36	The proposed actions could be expanded to include rewards for innovation and incentives that promote the use of alternative energy sources.	Noted.
200300363: Eastern Metropolitan Regional Council	41	The use of oil is not sustainable and other broader fuel types (ie. renewables, local sources, efficiency, affordability) in addition to hydrogen should be adequately considered.	Noted.
	42	There is also a definite need to increase public transport infrastructure and this should be coupled with an extensive consultation, public education and marketing program.	See Integrating land use and balanced transport.
	43	The proposed establishment of a taskforce (Action 2.24) is supported, however, there must be diverse and independent representation.	See the interim report of the Transport Energy Strategy Committee for information on the composition of this group.
200306829: Phillip Calais	3, p. 3	Increase vehicle fuel efficiency, including converting 25% of the government fleet to LPG and demonstrating the use of gas, hydrogen and biodiesel bus demonstrations. It needs to be noted that the extra 'overheads' involved in using LPG as a transport fuel result in there being little, if any GHG emissions reduction occurring, as compared to petrol or diesel. In the case of CNG being used as a transport fuel, there is evidence that shows that GHG emissions are actually higher than for petrol or diesel.	Noted.
200217800: Michael Bell	38	As the owner of a gas powered car I cannot recommend too highly the benefits of gas, but I am hearing constantly that there is not enough price difference to be worthwhile, there is not enough outlets or it is not suitable for their car.	Noted.

200303163: Brian Fleay	7, p. 4	Commercial aviation is the transport mode most at risk to petroleum product supply disruption. It does not receive the attention it deserves in the draft SSS.	Noted.
	5, p. 4	Re-inventing more sustainable agriculture and rural communities in Australia will take time – decades. The use of petroleum products will be indispensable to achieve this transition. <i>This task must have first call on</i> our remaining petroleum products.	Noted.
200303069: Australian Petroleum Production and Exploration Association (APPEA)	P5 par. 4	The Strategy's scope is comprehensive and illustrates the sustainable development goals and objectives with many commercial and community examples, including some from the minerals sector. However, APPEA is disappointed that the draft Strategy does not include detailed examples of oil and gas industry sustainable development achievements Note: See document for examples such as ChevronTexaco Operating in Sensitive Environments.	Noted.
200218007: Bunbury Port Authority	3	The world in which we live in has changed significantly since September 22, 2001. It is critical that any sustainability strategy provides for alternatives. In this respect the transition from carbon fuels to gas could make the State vulnerable and bring it to a standstill, should the Dampier to Bunbury gas pipeline be subject to terrorist activity. The Lonsdale gas explosion in Victoria demonstrates the impacts if relevance is solely on one source of supply.	Noted.
200303160: Goldfields Esperance Development Commission	Pg. 7	In more remote regions these issues are seen as very important, particularly in the changing world environment. The suggested Taskforce is a positive strategy.	Noted.
200300364: Peter Wilmot and Jan Knight	6	Oil Vulnerability: It's great to see this included. However we feel the case for urgent action on this issue could have been made more strongly.	Noted.
200303443: State Development Portfolio	91	The important points being made in this section of the Strategy are not initially clear. The early emphasis in this section (page 89) is on Australian and international long term oil demand and supply, along with political uncertainty. The text confuses these issues, however, by references to Western Australia having only one week of petrol supplies in WA and the longer run reduction in oil availability. Some editing may improve this.	Noted.

200303443: State Development Portfolio	92-93, 98, 101	This section also has a deficiency common to other areas of the Strategy in ignoring the impact of prices on behaviour. The cut off point for commodity extraction – and therefore reserve estimation – is dependant on the technological level of the day and prices.	These issues are addressed in the interim report of the Transport Energy Strategy Committee.
		The impact of rising oil prices expressed in the Strategy is related to personal transport choices, despite that the major impact would be a slowing of economic growth across the economy as it is forced to adjust to higher cost energy and mobilise the technological innovation needed to access that energy. The Strategy should briefly describe these impacts.	
		Discussion within this section providing estimates of the scope for biodiesel and renewable energy supplying sufficient fuels for the WA transport sector would be useful (p.90).	
		The indicators and targets (p.91) chosen for this area may need some modification. Gas and biodiesel should perhaps be considered in terms of market proportions supplied rather than absolute quantity. The relevance of middle eastern oil as an indicator needs explanation. The role of oil in the Consumer Price Index and the impact of oil or energy price changes might be a useful indicator of oil's economic impact.	
200302729: Shire of Serpentine- Jarrahdale	6, pg. 10	Proposed Actions The current action of having 25% of vehicle fleet is very weak it has no target date to tie government to and there should be a 100% conversion to LPG or better solution in regards to greenhouse emissions.	Noted.
200302774: Waste Management	p.10	The re-use of oil should be a major consideration in this section but gets no mention.	Noted. Referred to Waste Management Board
Association		Western Power is the largest WA user of re-refined oil, using about 6-7ML per annum of recycled oil for electricity generation at the Esperance, Broome & Derby Power Stations and according to recent decisions, the remote stations will soon change to gas or other fuels. Where will all the recycled oil go then? The strategy needs to address this issue.	
		Re-refined oil should be classified as a renewable energy source and its use as a renewable energy source should be promoted.	

200303350: Graeme Olsen	3	The draft Strategy would be improved if it discussed in greater detail the opportunities for biomass fuels, clarified some of the misconceptions held about this class of fuels, and if found to be justified, argued for changes to the Commonwealth Renewable Energy Act to allow woody bioenergy crops to earn renewable energy receipts.	Noted.
200303076: WA Sustainable Energy Association (WA SEA)	3-4 p.6	History has shown that projections of hydrocarbon resources are unreliable and we believe that the term "oil vulnerability" could discredit an otherwise sound strategy. Rather than debating when oil will run out we propose the adoption of a "risk management" approach that facilitates the development of alternatives to hydrocarbons in all end-uses. WA SEA believes that there remain substantial technical barriers to the widespread use of hydrogen (refer "Renewable Energy Technology Roadmap" BCSE, ACRE et al Oct 2002). Sensible incremental steps towards a "hydrogen economy" may be missed if this technical risk is underestimated.	These matters are addressed in the interim report of the Transport Energy Strategy Committee.
200303354: Western Power Corp	12	A State Strategy should recognise that the transition away from fossil fuels will not "happen overnight" and should retain enough flexibility to respond to emerging developments.	Noted.
200219116: Wheatbelt Development Commission	18	Where practicable, 100% or close to it, of the Government vehicle fleet should be on LPG, especially the Executive Vehicle Scheme vehicles. This would foster a cultural shift towards LPG being lead by the senior executives in Government. The current 25% requirement is largely seen as a impost which needs to be met, rather than a genuine commitment to reducing oil dependency, reducing LPG pump prices or reducing vehicle pollution.	The final Strategy includes a commitment to adopt a revised Government vehicle fleet policy which will reduce CO2 emissions.