

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

Section Three – Sustainability and Governance Introduction

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300889: John Vukovich	P 4 par 7	P35 "the draft strategy describes how the government will undertake to support the pursuit of sustainability for Indigenous communities." Because the indigenous people hold the key to the knowledge of sustainability on this continent, the government should be asking for directions from them.	Noted.
200303048: Conservation Commission of WA	1, pg. 7	The sustainability policy process in Western Australia offers an opportunity to experiment with different ways of measuring quality of life. The Commission believes that community input could be obtained to determine quality of life indicators. These indicators could then be used to compare and evaluate policy choices. The Commission has the view that a wide community debate on this issue would result in a more explicit weighting being given to the value of natural assets. The Commission therefore recommends that the Final Sustainability Strategy should include a section/chapter that outlines how the alternative progress measurement/quality of life indicator issue will be dealt with.	Agreed. This will be addressed as part of the development of headline sustainability indicators for Western Australia. See <i>Measuring and reporting on sustainability</i> .
200303312: Department of Conservation and Land Management (CALM)	Page 4	The Department is keen to improve the sustainability of its operations State-wide, and to adopt the relevant strategies identified in the State Sustainability Strategy. It is suggested that a model or example of a Sustainability Action Plan required by agencies be provided, so that agencies have an indication of what is involved in carrying out this task, and the resources required.	Agreed. The Sustainability Policy Unit will develop a model of a Sustainability Action Plan to guide government agencies.

Introduction *continued*

200303092: Housing Industry Association	2-5, p.7	<p>Chapter 3 perpetuates the old paradigm or 'top down' approach. What is required to take Western Australia forward is a fundamental change in the way governance occurs – to embrace business and community as well as state and local government early in policy setting, determining actions, implementation in monitoring and evaluation of programmes and actions.</p> <p>Accordingly, Chapter 3 and the strategy's relevant principles, visions, goals and areas of action should be reworded to embrace such inclusionary methods.</p> <p>HIA as the leading industry association for the State's housing design and construction would like to assist in rewriting this chapter and participate with state agencies and local government early in setting the sustainability agenda particularly with regard to the planning system, which is of central relevance to housing and HIA.</p> <p>With regard to the development of regional sustainability strategies (p35 etc refers) the role of HIA in guiding subdivision and housing for regional and remote areas and different climatic zones is particularly relevant. HIA would like to be included in formulating appropriate housing strategies for the State's regions:</p>	<p>Noted.</p> <p>The sustainability principles reflect the need for participation in policy development.</p> <p>Noted. Industry stakeholders will be provided with opportunities to participate in the ongoing development of sustainability initiatives. See <i>Partnerships for action and Institutional change</i>.</p>
200303590: WA Collaboration	Rec. 3	<p>Recommendation 3 Genuine participation in Western Australia</p> <p>The WA Collaboration is committed to a genuinely participatory approach to sustainability in Western Australia. The WA Collaboration recognises that the State Government has gone some way towards recognising the fundamental importance of the interaction between government and its citizens through the work of the Citizens and Civics Unit, and other initiatives such as the Statement of Commitment signed with ATSIC (Aboriginal and Torres Strait Islander Commission) and peak Aboriginal bodies.</p> <p>State and Local Government agencies should:</p> <ul style="list-style-type: none"> incorporate into their policy and procedure manuals a concrete method for consultation and participation that incorporates a 'whole of government' approach; ensure that appropriate budgetary allocations are made to implement best practice community engagement, as outlined in the Consulting Citizens Guide, and report annually on progress; and <p>ensure that any future implementation of the State Sustainability Strategy, particularly at the regional level, is based on best practice community engagement processes.</p>	<p>Now part of Sustainability Code of Practice and agency Sustainability Action Plans.</p>

Introduction *continued*

200303590: WA Collaboration	Rec. 21	<p>A framework for human rights in Western Australia</p> <p>A just and sustainable Western Australia must be based upon a sound human rights framework. The State Government should adopt a human rights framework and incorporate it into state legislation. Such a framework should encompass the following:</p> <ul style="list-style-type: none"> • acknowledge the inalienable right to land of Aboriginal people and ensure just economic outcomes; • acknowledge past wrongs and provide for just reparation (including provisions of the original WA Constitution); • introduce an Aboriginal Land Act, in consultation with Aboriginal people; • clear acceptance of international obligations by Western Australia and other state, territory and Commonwealth governments in addressing Aboriginal issues; • clear acceptance of international obligations in relation to asylum seekers and refugees, including their right to appeal; • equitable access to legal representation for all Western Australians; • development of a comprehensive, integrated Anti-Racism Strategy; • replacement of the traditional one-size-fits-all, 'mainstreaming' approach to social policy and programs with one that acknowledges, respects and effectively responds to the state's cultural, linguistic and religious diversity; and ▪ introduction of a bill of rights which is incorporated into the state constitution and lobby for a similar provision at the national level. 	Beyond the scope of State Sustainability Strategy. The 11 principles do this to some extent.
	1, pg. 4	The WA Collaboration has some concerns with the Department of Planning and Infrastructure being responsible for Social Assessment.	Alternatives examined.

Introduction *continued*

<p>200305584: Municipal Waste Advisory Council</p>	<p>1-2,4 p.5</p>	<p>In general terms, the Strategy will encourage Local Governments to work together to enable a cost effective, coordinated approach, providing greatly needed structured guidance on this issue. It is believed, however, that the potential resource drain to set up and implement this Strategy is already under resourced, struggling, small shires will be significant and the need for increased expertise high. Increased funds would be required for audits, formulation of management plans and implementation and monitoring of actions and additional staff training and time will be necessary. Assistance in setting up regional groups particularly in rural areas is necessary to ensure cost effective implementation of the Strategy. Education programs will be essential to convince residents and ratepayers that sustainability is a vital issue.</p> <p>MWAC is particularly concerned that the Strategy will require Local Governments to implement actions, whereas State departments are only encouraged. MWAC believes that all should be treated equally, either both required or both encouraged. It is important that State government takes the lead in the implementation of the Strategy. Implementation will be slow and limited, if not required.</p> <p>The Strategy is unclear as to the exact constitution of the Roundtable. In order to ensure optimum discussion, the Roundtable would best be served through the inclusion of several members of WALGA, at least one of whom should be a sitting member, with the remaining members representative of relevant issues before the Roundtable. MWAC is supportive of the inclusion of community and industry stakeholders in the Roundtable in an informative capacity. However, to maintain consistency with the intent of the Roundtable, any voting rights of these stakeholders in the Roundtable would be considered inappropriate. It should also be made clear who is bound by the decisions of the Roundtable and how those decisions will be enforced.</p>	<p>Sustainability is a growing priority. Resourcing will be considered on an on-going basis.</p> <p>All actions are aimed at 'encouraging' change. "Required" will occur after demonstration and general acceptance.</p> <p>The State Local Government Sustainability Roundtable included the President and CEO of WALGA, the Director General of the Department of Local Government and Regional Development, the President of Local Government Managers Australia (WA). The Roundtable hosted a number of workshops with local government participation.</p>
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Section Three – Sustainability and Governance Sustainability Assessment

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	12	New structures and improved processes to incorporate sustainability assessments at the State Government level (Actions 1.1 and 1.2) are supported and will assist in providing a framework for Regional Councils and Local Government to fit into.	Noted.
200300261: City of Albany	4	The Strategy recognises that a key component in making sustainability work is the formulation of a suitable assessment process. The Strategy outlines that the Environmental Protection Authority Services Unit will be responsible for environmental assessments, the Department for Planning and Infrastructure will be responsible for social assessments and the Department of the Treasury and Finance will be responsible for economic assessments. The assessment process appears to be very centralised as a result of a State focussed assessment process for projects, plans policies and programmes.	The final processes for sustainability assessment of complex or strategic projects are yet to be determined. The Sustainability Scorecard approach for development control will be developed through the Western Australian Planning Commission. See <i>Sustainability assessment</i> .
	5	Due to the volume of projects, plans, policies and programmes that are created both by State and local government it is not considered practical to base an assessment process in three centralised agencies. In the case of local government there needs to be provision to make this assessment 'in house', utilising existing expertise to ensure that the local context is given due consideration. The development of local assessment processes is of particular importance as local governments are positioned to have the greatest immediate impact on sustainability due to their close relationship with the community.	Noted.
200300305: The Institution of Engineers, Australia.	19	It is noted that the environmental assessment process inherently targets the protection of the environment after concepts and plans have been devised, just prior to development, when development approvals are required. The Sustainability Assessment process however, targets development at the planning stage. The Strategy suggests that assessment will be done through separate units with the Department of Planning and Infrastructure (DPI), Department of Environmental Protection (DEP) and the Department of Treasury and Finance (DTF). It will be critical to have an integrated approach to the assessment, especially when dealing with the expectations of timely advice/feedback to the private sector and industry. Practical and efficient integration arrangements need to be put in place so that there aren't any unnecessary bureaucratic impediments to the assessment process.	Agreed. Sustainability assessment requires integrated assessment processes.

Sustainability Assessment *continued*

200300305: The Institution of Engineers, Australia.	20	One means of attaining integration may be to establish the Assessment Unit within the Office of Major Projects. The Assessment Unit will be responsible for coordinating the overall assessment process by liaising with each of the Sustainability units within the three departments described in the Strategy (DPI, DEP and the DTF).	Noted. Final arrangements for sustainability assessment of complex or strategic projects are yet to be determined. See <i>Sustainability assessment</i> .
	21	Because sustainability covers the business of almost every department and its scope is wider than just development projects, one approach would be to establish an 'Office of Sustainability' within the Department of Premier and Cabinet, that include a Policy Section and an Assessment Section (see figure below). The Policy Section would guide and advise the various Government Departments on the implementation of sustainability as well as the development of Sustainability Reporting while the Assessment arm would coordinate the assessment process for projects from the DPI, DEP and the DTF.	Noted.
	25	Little guidance is provided for small business within the Strategy. Government should develop a short document or series of booklets on sustainability for small business. The purpose of this document would be to look at how small business could contribute to sustainable development through provision of examples and teaching small business how to carry out simplistic sustainability assessments on their own business.	This is addressed in the final Strategy. See action 6.4 in <i>Training and facilitation for sustainability</i> .
	26	Citizen juries and other novel means of incorporating public input to planning decisions are raised. These may be useful tools but it should be noted that in many or most cases communities will lack the necessary skills to fully engage with such processes, so capacity building on the part of Government and planning agencies would often be needed and substantial resourcing will be necessary.	Noted.
	27	There is a need to consider sustainability of all new legislation even where it may not have an obvious social or environmental effect. An example of this is the Federal Government's so-called 'Pacific Solution' legislation to deal with refugee resettlement and assessment. This could be considered just about anything but sustainable in either of its social or environmental aspects. Good authority sources note that the countries accepting to participate with the Australian Government in this process face many dire social and environmental problems as a result of their participation.	Noted.

Sustainability Assessment *continued*

200219280: City of Swan	16	The possible criteria for sustainability assessment of projects, plans, policies and programs outlined in Table 2 (page 37) needs to be carefully developed. It is critical for the report to demonstrate how a particular technique can be used as an aid to decision making "... which integrates social, economic and environmental factors and can incorporate the principles of sustainability." (See page 37)	Agreed.
	17	Although 'There is no single preferred approach and each jurisdiction must build on the unique legislative and institutional machinery...' resource and experience limitations in agencies must be recognised. The development of a common framework and assessment mechanisms would go along way in assisting various bodies in incorporating the concept into the strategic planning and operational frameworks of organisations.	Agreed. See <i>Sustainability assessment</i> .
200300307: Hamersley Iron	10	Hamersley strongly endorses the notion that establishing a coherent sustainability assessment framework should only be applied to very large projects of State significance (page 36).	Noted. The final Strategy indicates that sustainability assessment will apply to complex or strategic projects as determined by Cabinet.
	14	Hamersley cautions the State on the applicability of sustainability assessment through a wide range of projects, plans, policies, and programs and endorses the approach of selecting a significant case study (i.e. the Gorgon Project) to evaluate the methodology and determine how manageable such an approach is for mainstream adoption throughout Western Australia. Hamersley suggests that general guidelines for assessment might be useful to develop in the event that a full sustainability assessment methodology is not practical to use.	Noted.
	15	In the discussion on the character of sustainability assessment (page 36) Hamersley notes a reference to finding integrated solutions where tradeoffs are minimized or non-existent where possible. In Hamersley's experience, tradeoffs are more likely to exist than not, and there needs to be recognition that win-win against all measures is often not practical.	Noted.
	16	In particular, Hamersley notes the possible criteria for sustainability assessment outlined in Table 2 on page 37. Against the ecological criteria, Hamersley suggests that "reducing ecological footprint while improving quality of life" may not be the optimal measure for determining ecological impact. Against this measure a new large-scale resource development project (such as a new open cut mine) could never produce a positive result. Hamersley suggests a better measure would be one that is more inclusive of total environmental impact and could assess potential environmental benefits that might come through land-swaps for conservation management, funding available for R&D projects or improved land management programs for adjacent areas.	Noted.

Sustainability Assessment *continued*

200300307: Hamersley Iron	17	Hamersley notes that the State intends to establish three Sustainability Assessment Units to provide capacity for the implementation of sustainability assessment. Hamersley believes that the creation of these units and development for criteria for assessments should be undertaken in consultation with non-government organizations, universities and the private sector. In particular, Hamersley believes that very strong assurance processes need to be developed to ensure that project sensitive economic information is treated with absolute confidence. In some circumstances, companies may not readily release highly sensitive economic information about proposed projects.	Final arrangements for undertaking sustainability assessment are yet to be determined.
200300348: City of Bunbury	29	The document makes mention that to ensure that government achieve overarching sustainability that the government will carry out sustainability assessment on significant projects. It is suggested that local government should be involved as a key stakeholder in the development of a sustainability assessment criteria. It is also recommended that local government should have a role to play in the assessment process, as it is the closest sphere of government to the community, being best able to table views of the community.	Noted.
200300368: City of Kalgoorlie- Boulder	1	The proposed Social Assessment Unit within the DPI is considered positive but this Unit should be given clear guidelines, which can in turn be given to Local Government to ensure that the matters submitted by local government that the Unit will consider can be addressed by the Local Government in order to minimise potential delays in processing of Scheme Amendments, strategies, Outline Development Plans and other documents reviewed and endorsed by the DPI.	Noted.
200300357: Water Corporation	21	To change the framework within which decisions are made is one of the keys to developing different and more sustainable solutions. Coupled with this, is the need to change the mindset or paradigm out of which the current system arises. The new framework should not be viewed as a checklist, but as a process that will challenge current paradigms, encourage greater understanding of issues and evolve new ways of thinking through stakeholder dialogue.	Noted.
	24	On page 38 there is discussion of the establishment of the sustainability assessment units within three key government departments. The nature and objectives of the liaison process between the three key government departments should be well defined, including how they maintain relevancy. Perhaps in the transitional phase a formal mechanism could be set up. This could take the form of a joint working group to ensure these departments not only build understanding of the issues in their own "patch", but to also ensure a cross pollination of views and to gain an understanding of the links between environmental, economic and social factors. The Water Corporation has significant dealings with most of the key government agencies, including the Economic Regulator in the future, a consistent approach to Sustainability is therefore imperative to progressing towards becoming more sustainable.	Final arrangements for undertaking sustainability assessment are yet to be determined.

Sustainability Assessment *continued*

200300357: Water Corporation	25	On page 41, indicators and targets, in addition to measuring "Capacity within government ... to participate in sustainability assessment" a complementary lag indicator could be introduced over time to show traction. An example is "percentage and number of key projects, policies, programs and agreements reviewed against sustainability principles and modified where necessary".	Indicators and targets have been removed from the final Strategy.
	26	Building on the proposed actions set out on page 43 (Section – Institutional Change) to "support regular communication and information exchange for capacity building in sustainability across the public sector", a key area for capacity building is understanding the philosophy of, and being able to carry out sustainability assessments. The Corporation suggests that the rate of implementation of sustainability assessments as a decision making tool would be increased, and cross pollination of views could be nurtured, if the Sustainability policy unit was given the central coordination role in providing an across government education program.	Agreed. The final Strategy gives the Sustainability Policy Unit responsibility for capacity building and awareness raising across Government.
200302968: Beverage Industry Environment Council	18	The use of " <i>sustainability assessment</i> " for new projects and the proposed action to establish an industry-government working group on sustainability assessment appears reasonable. However, the proposal to use three separate "Sustainability Assessment Units" in three separate Government Departments (DEP, DPI and DTF), would be an unworkable situation and would deter companies developing new projects and technologies in WA. The national model – eg NSW, VIC, QLD, SA – is for the establishment of sustainability units within a single agency. Such a unit would manage and act upon any actions arising from the Sustainability Strategy.	Noted.
200302856: City of Stirling	6	The City supports the introduction of an overarching integrated assessment process such as sustainability assessment and multi-criteria analysis (p 33). It would be appropriate for the Government to take a leadership role in developing these assessment systems, as the adoption of these systems often require resources beyond the means of local authorities. The City is currently analysing the possibilities of implementing an assessment system (decision making checklist) that could assist in the assessment of the sustainability of all major decisions. The adoption of a Sustainability Code of Practice (p 39) is supported as it will form common ground and will provide guidelines to government agencies on how to consistently implement decision-making tools into day-to-day activities. <i>This action is generally supported.</i>	Noted. See <i>Sustainability assessment</i> for information on the Sustainability Scorecard approach which is relevant to Local Government decision making.
200303265: Val...	1	I would encourage the strongest possible Sustainability Commission which oversees the Biodiversity Commission, the Environmental Protection Authority, as well as economic and social agencies.	Noted.

Sustainability Assessment *continued*

200302880: City of Wanneroo	23	Action 1.4 - Instead of just assisting relevant agencies to incorporate sustainability practices into their policy functions this should be required of all agencies.	This will be addressed as part of the Sustainability Code of Practice for Government Agencies. See <i>Embracing sustainability in government agencies</i> .
200311216: Zoe Moore	12	2 nd last paragraph, last line The use of economic terminology here is indicative of the lack of true commitment to sustainability and a paradigm shift.	Noted.
	13	last paragraph - public <i>engagement</i> only? Demonstrates the transparency of governmental dedication to public consultation.	Noted.
	14	Box 7- Hamersley Iron's Sustainability Assessment Process. This is a paradox! Mining is inherently an unsustainable practice and can achieve no environmental benefit and only shallow, short-term social benefit. This assertion of 'sustainable' mining is also found on p52, expressed as a partnership for action with petroleum production. Certainly, these two industries have a long history of partnership, each supporting the other out of mutual economic interest. The paradox can again be found on p58 under the heading, <i>Sustainability in the Regions</i> .	Noted.
200302959: City of Fremantle	7	While it is acknowledged that local government has a critical role in planning and decision-making for sustainability, the actions proposed do not adequately allow or support local governments to undertake sustainability assessments.	This could be addressed through the development of the Sustainability Scorecard. See <i>Sustainability assessment</i> .
	8	The State-Local Government Sustainability Roundtable...this type of arrangement has the potential to fail unless durable and resilient processes are established to ensure the success of this Roundtable process, irrespective of political party leadership in government. Funding and resourcing should also be made available for the Roundtable process. Clearly defined and agreed terms of reference should also be established and approved by Cabinet.	The function of the State Local Government Sustainability Roundtable will be absorbed by the Sustainability Roundtable that will ensure representation and involvement from Local Government in the ongoing development of the sustainability agenda.
	9	Proposed action 1.2 should be changed to "Establish an Industry-Government Working Group on Sustainability Assessment to develop an agreed process for application across State and Local Government decision making processes".	This was not the focus of the Industry Working Group. The focus of the Working Group was to share information on existing arrangements for sustainability assessment of projects to inform possible future arrangements.
	9	An additional proposed action 1.3 should be, "Government to facilitate the implementation of the agreed sustainability assessment process across State and Local Government with adequate resourcing".	Noted.

Sustainability Assessment *continued*

200302960: Urban Development Institute of Australia	13	<p>The implementation model proposed in Chapter 3 of the Draft Strategy, 'Governance' proposes the establishment of 3 separate Sustainability Assessment Units across 3 different government agencies. UDIA does not consider this the most preferable model for the following reasons:</p> <ul style="list-style-type: none"> • The 'triple bottom line' approach to sustainability inherently requires an integrated approach to sustainability assessment. One element of sustainability cannot be assessed in isolation to the other two elements. • Developers currently liaise with a multitude of stakeholders including local government, state government departments, agencies and utilities. Additional requirements are likely to result in time delays, and cost increases for both the proponent and regulator. • The model does not designate the ultimate arbiter. 	Final arrangements for undertaking sustainability assessment are yet to be determined.
	16	UDIA members experience significant delays in receiving planning approvals. Recent WAPC figures show a marked decrease in the number of applications determined within statutory time frames. The addition of any further application, assessment and referral requirements will compound this problem.	Noted.
	17	...The introduction of new compulsory sustainability measures and assessment procedures, which increase the cost of housing to the buyer such that they are priced out of the market, would not meet the social benefit criteria of the sustainability package.	Noted. This must be considered in the development of the proposed Sustainability Scorecard approach.
200303268: Diane Matthews	5	The environment has been left out of this proposed sustainability assessment loop. Based on previous track records such a process would fail to produce sustainability as recommended in the Strategy. The basic environmental elements of biodiversity conservation, clean air, soil and water require a strong advocate in any proposed Working Group on Sustainability Assessment.	The Working Group on Sustainability Assessment involved non-government environment organisations as well as government agencies with responsibilities for environment matters.
2003002855: Planning Institute of Australia	15	The Strategy does not explicitly acknowledge that an approach to sustainable development which involves a change in approach or thinking may be in conflict with current trends and contrary to the shorter time horizons of land developers and consumers. The notion that existing processes will be difficult to change because of "the silos of government and disciplines of professions" does not acknowledge that these processes are often a direct response to community and political pressures and that the public are not likely to acquiesce simply on the basis that sustainability outcomes will be achieved.	Noted.
	25	In short sustainability assessment is likely to involve more skilled resources, more time and involve substantial training until the principles and practices are well established.	Noted.

Sustainability Assessment *continued*

2003002855: Planning Institute of Australia	26	Given the numbers of projects, plans and programs developed at the state and local government level, it would not be practical or efficient to separate the responsibility for sustainability assessment into three government agencies as recommended. Whilst each of the agencies and many others can provide the essential data on their areas of expertise, there needs to be one agency responsible for the task of integrating this data and making the decision on the outcome. Current legislation places the responsibility of decision making on state or local government planning agencies and this needs to be acknowledged in the Strategy.	Final arrangements for undertaking sustainability assessment are yet to be determined.
200303065: City of Gosnells	9	It is unclear from the Strategy exactly which state government department will take responsibility for overseeing the introduction of sustainability practices and sustainability assessment into the State's administrative agenda.	The Sustainability Policy Unit will maintain a coordination role to oversight the implementation of the State Sustainability Strategy across Government and will work with agencies to ensure this occurs.
200301547: City of Cockburn	6	The Strategy discusses Social, Economic and Environmental Assessment Units being developed within separate agencies as a transitional arrangement to initiate sustainability assessments. The process of assessment and the communication lines between these Units will need to be clear to ensure integration of ideas and the Units will need to be sufficiently resourced to undertake adequate assessments. The final decision maker in this process is also unclear and would need to be clearly established.	Final arrangements for undertaking sustainability assessment are yet to be determined.
	7	The development of a sustainability assessment process should include genuine and thorough public and stakeholder consultation (appropriate to the scale of the proposal) and, where possible, integrate with existing processes to avoid duplication, process confusion and excessively lengthy Government approval processes.	Agreed.
200303161: William (Bill) Grace	9	As a member of the Keating Committee, I was involved in the recommendations related to Sustainability Assessment. I believe that the adoption of processes such as this will ultimately yield the greatest benefits from the Strategy in the longer term. However, there are some significant issues to resolve before a coherent process can be introduced. -Criteria for social and economic assessment -Integrating the assessments (Note: see original document for details)	Noted.

Sustainability Assessment *continued*

200303161: William (Bill) Grace	10	Criteria: Note: see original document for details ...The reality is that in the past, the State has been essentially “reactive” to development proposals, rather than attracting development based on any specific industry development strategy. We run the risk that moving towards the assessment of proposals on a holistic economic, social and environmental basis, in the absence of clear objectives, will lead to arbitrary decisions and an undermining of the credibility of the process. As noted elsewhere in this submission, any Sustainability Strategy must incorporate a clear Industry policy, which itself is based on sustainability principles.	Noted.
200303069: Alcoa	1, p.4	Alcoa supports the use of one “sustainability assessment” approach for projects of major significance. The draft Strategy highlights that “ <i>sustainability assessment is not meant to provide another set of barriers...</i> ” It is critical to Alcoa’s future business development that the government approvals processes are transparent and predictable, and provide certainty for both ourselves as proponents and the communities in which we operate. We believe however, that the action proposed in the draft Strategy does not deliver this outcome. In particular, the proposal to establish three separate “Sustainability Assessment Units” in three separate government departments will make the current project approvals process increasingly cumbersome, onerous and time-consuming, resulting in barriers to further economic investment in Western Australia. This change will only exacerbate the current issues in the project approvals process, which is slow and demands multiple contacts with separate, and often disconnected government agencies.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
	4, p.4	We also believe it is appropriate and beneficial for government agencies and government-based enterprises to undertake sustainability assessments of its own proposals and activities, including those which might be formed in partnership with private sector or community organisations.	Agreed.
200303088: Australian Association of Planning Consultants (AAPC)	4, par. 4	The statutory implications of this process are unclear in the document at this stage but are likely to require changes to existing planning and environmental legislation and administrative structures if the assessment procedures are to be truly integrated and directly accountable to the determining authority. It will be of particular concern if the establishment of the new assessment units results in duplication of resources, cumbersome procedures, propensity for appeals and additional timeframes for assessment and determination of proposals without beneficial outcomes.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.

Sustainability Assessment *continued*

200303088: AAPC	5, par 2	Sustainability assessment is more likely to be expressed in quantifiable terms by the use of scored indicators rather than in qualitative terms. There is a need therefore to be clear about what indicators are being used and why, that they are relevant to a proposal's assessment and that they are measurable.	Noted.
200303088: AAPC	5, par 4	Ensure that sustainability assessment results in a change of emphasis, not a new industry - Ensure that sustainability assessment indicators have the capacity to achieve net sustainability gains - Include AAPC representation on the Industry-Government Working Group on Sustainability Assessment	Noted.
200303048: Conservation Commission of WA	2, p. 5	The Commission recommends that the Final Sustainability Strategy discuss in detail how a State Government policy on net conservation benefit should be developed. The Commission believes that relevant Government agencies should further develop the concept, and that a wide community debate should be held about the issue.	Noted.
200303348 Conservation Council of WA	2, par 5	Recommendations associated with Sustainability and Governance fail to adequately address the need for institutional reform to achieve sustainability. There are inadequate suggestions for legislative reform and responsibility for implementing recommendations is not assigned to Government agencies. The Council believes that these two elements are <u>essential</u> if the final strategy is to have real effect.	The final Strategy includes the development of a Sustainability Act and the Action Plan assigns responsibility for actions to relevant agencies.
	2, par 7 and 3, par 1	<p>Page 40 of the strategy: "The government will consider existing legislation when it is reviewed to identify where there are opportunities to incorporate sustainability principles and practices and include guidelines in the Parliamentary Counsel's Guidelines and Procedures for the drafting of legislation to ensure that sustainability is addressed in future legislation."</p> <p>This timeframe is unacceptable – at the very least key sustainability-related legislation must be amended as soon as possible or a key aspect of the agenda may not happen.</p> <p>Recommendation</p> <p>The Council recommends the drafting of a Sustainability Act, to enshrine much of what is contained in the draft strategy, and to establish a Sustainability Commission to oversee the sustainability assessment system. The final strategy must include an outline for this proposed new legislation.</p>	<p>Noted. See above.</p> <p>The final Strategy includes provision for the drafting of a Sustainability Act.</p>

Sustainability Assessment *continued*

200303160: Goldfields Esperance Development Corporation	Pg. 4	<p>The proposed Social Assessment Unit in the Department for Planning and Infrastructure (DPI) and an Economic Assessment Unit in the Department of Treasury and Finance are considered positive strategies. The Units could assist agencies to address sustainability issues and assist agencies, including Development Commissions with their incorporated plans, and other agencies with their action plans. The Units would need to be inclusive of all tiers of government. There are already some achievements evident in the field and best practice examples could benefit others.</p> <p>The suggestion of a Sustainability Policy Unit, combining Industry/Government expertise is seen as a positive move. This group would be a major resource to industry.</p> <p>The GEDC fully supports this action.</p>	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
200309737: Office for Women	4	<p>The State Sustainability Strategy currently holds a number of opportunities for the inclusion of gender equity principles. They include ensuring that:</p> <ul style="list-style-type: none"> . gender assessment is integrated into models of sustainability assessment and audits, to show what impact policies have on equality between women and men 	This is addressed in the final Strategy.
200303740: WA Council of Social Service (WACOSS)	2, p.5	<p>As per WACOSS' previous submission, employment in its broadest sense was identified through our research as a core component of social sustainability. As a consequence we believe that employment and employment conditions needs greater focus within the State Sustainability Strategy. A particular area of the Strategy where we believe employment-related issues should be explicitly incorporated is in the Sustainability Code of Practice and Action Plans for government agencies. This should occur in relation to procurement policies, for eg. giving additional weight in tendering processes to contractors who target employment for the long-term unemployed or those otherwise disadvantaged in the labour market. In addition the employment practices of government agencies themselves should be included as part of their Action Plans.</p>	This could be addressed as part of the development of the Sustainability Procurement Policy.
200302948: Environment Defenders Office	Page 3, para 4	<p>The Sustainability Commission should not, however, replace the environmental impact assessment process undertaken by the Environmental Protection Authority ("EPA") or other environmental approval processes. The assessments undertaken by the EPA and as part of other environmental approval processes are primarily directed to assessment of a single sustainability principle, being "biodiversity and ecological integrity", just as assessments by Treasury or government agencies charged with exploitative functions are focussed solely on another single principle, being "long term economic health". Removing or replacing the environmental impact assessment process with a sustainability assessment would therefore remove focussed assessment of one of the foundation principles of sustainability while assessment of the other factors remain. This would result in a biased assessment and would not achieve sustainability.</p>	Noted.

Sustainability Assessment *continued*

200303348: Conservation Council of WA	5, par 2-6	<p>There is significant emphasis put in this section of the draft strategy on sustainability assessment of major projects. While working towards a triple bottom line assessment process for large projects is undoubtedly crucial, the draft strategy seems to discount the importance of impacts resulting from small projects, and from other types of proposal (policies, plans, and programmes). For example, on page 36 of the draft strategy, the following statement is made:</p> <p style="padding-left: 40px;">"... the review (<i>Keating Review</i>) noted that most submissions in response to its interim report were supportive of establishing such a framework (<i>ie for sustainability assessment</i>) but not for small projects".</p> <p>This is disappointing. It appears to be supporting the Keating Review position in relation to sustainability assessment, and it contradicts other parts of the Sustainability Assessment section that call for sustainability assessment of small projects and PPPs.</p> <p>In many respects, impacts from major projects are already properly scrutinized, and big proponents are well aware of their responsibilities. It is possible, in fact, that more serious cumulative impacts may result from many small projects, and from PPPs, than from so-called 'major projects'.</p> <p>Recommendation</p> <p>The Council believes that all recommendations relating to sustainability assessment made in the final strategy should be made explicitly relevant to small projects, and to PPPs.</p>	Noted.
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Sustainability Assessment *continued*

200303348: Conservation Council of WA	5, par 7-9 and 6, par 1- 2	<p>Institutional reform for sustainability assessment: On page 36, the draft strategy makes the comment that:</p> <p style="padding-left: 40px;">“.. While Government will move to establish the institutional and legislative basis for sustainability assessment, it is proposed that transitionary arrangements be put in place..”</p> <p>The Council’s view is that the transitional arrangements outlined on page 38 are unwieldy and unnecessarily burdensome for proponents. The draft strategy suggests that sustainability assessment will require separate assessments of proponent documentation to be undertaken by three Sustainability Assessment Units. It is further suggested that these units will “need to liaise closely with each other”. Without any legislative requirement for these Units to work in unison, the Council doubts that this arrangement will work in practice.</p> <p>The Council also has deep concerns about the prospect of having the social impact assessment function based in the Department of Planning and Infrastructure. We do not believe that this is the appropriate agency to have responsibility for social impact assessment – they do not have the skills, expertise nor commitment to social issues.</p> <p>In addition, the draft strategy suggests that final assessment of documentation should be the prerogative of the Office of Major Projects (for social-economic-strategic issues) and the EPA (for environmental issues). With no hierarchically superior agency in place, it would appear to fall to Cabinet to synthesize the information presented to them by OMP and EPA. It is difficult to envisage how all this would work in practice.</p> <p>As is stated in the above quote, the draft strategy commits the Government to move to establish the institutional and legislative basis for sustainability assessment. The Council believes that the final strategy must go beyond hinting at a new legislative/institutional framework, to present a fully-fledged reform proposal.</p>	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
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Sustainability Assessment *continued*

200303348: Conservation Council of WA	6, par 3-7	<p>We believe that DPC already understands the alternative models that might be implemented. These were presented to an informal workshop in May 2002. In short, and as presented at the May workshop, they consist of:</p> <ul style="list-style-type: none"> a. Empowering the EPA to carry out sustainability assessments. b. b. Restructuring the EPA into a new agency with a broader focus on sustainability. c. Creation of a new Sustainability Commission. <p>The Council supports Option c, but all options are improvements over the current situation.</p>	Noted.
	8, par 1	The Council recommends that the strategy should discuss the significance of the distinction between EIA-driven and sustainability-led assessment, and should develop institutional arrangements that support sustainability-led assessment.	Noted.
		<p>Comments on Table 2: Possible criteria for sustainability assessment...</p> <p>In the promoting the positive column:</p> <ul style="list-style-type: none"> ▪ The idea that we have to be providing short and long term economic gain seems to imply economic growth rather than progress. ▪ What is meant by 'sense of place'? And how would that become part of a sustainability assessment process? Perhaps 'sense of community' is a more inclusive and expansive concept? <p>Ensuring there are "acceptable levels of risk with adaptation processes" is an interesting concept in relation to the precautionary principle. How is an acceptable level of risk defined, and by whom?</p>	Noted.
200303057: Future Directions Inter.	1, par 3	Perhaps the key challenge for the implementation of the State Sustainability Strategy is the development of appropriate sustainability assessment methods that underpin much of the strategy. ...However, the government must invest in the research necessary to develop appropriate methodologies and must ensure that the methods are well understood by those implementing them and have widespread support amongst all stakeholders.	Noted.

Sustainability Assessment *continued*

200303348: Conservation Council of WA	8, par 3-5	<p>The opening statement is fairly comprehensive and seems to be quite good. However, we have reservations about the term “net benefit”. This implies that if the economic benefits far outweigh the environmental and social problems a project/program etc could go ahead, even if the environmental/social issues are significant. The statement should be modified to “provide net environmental, social and economic benefits”.</p> <p>The draft strategy suggests that each agency should develop checklists for their own internal sustainability assessments. We believe that there would be better consistency across government if a checklist was developed centrally that can then simply be modified by agencies as required.</p> <p>The indicator specified is relatively meaningless. How can it be measured? The extent to which sustainability assessment is used eg the % of programs/policies/projects etc that are subjected to sustainability assessment would be more useful.</p>	<p>This is addressed in the final Strategy. See <i>Sustainability assessment</i>.</p> <p>The Sustainability Policy Unit will support the development of centralised guidance to agencies to conduct sustainability assessment.</p> <p>All targets and indicators have been removed from the final Strategy.</p>
200303048: Conservation Commission of WA	1, pg. 10	The Commission therefore recommends that the Final Sustainability Strategy should present explicit proposed actions that address the need for sustainability assessment of small projects, policies, plans and programmes, Cabinet submissions, and proposed legislation.	Government projects, policies, plans and programmes, Cabinet submissions and legislation will be subject to sustainability assessment.
200304162: Environment Protection Authority	Page 1, para 2 and 3	<p>It would be useful if the draft strategy were to articulating how the independent roles of the EPA and the functions of the proposed Sustainability Unit might work. The EPA’s view is that sustainability assessment should build upon the strengths of the existing EPA processes but not replace them.</p> <p>It is suggested that, in the future, not only should triple bottom line assessment protect the environment, it should also consider the possibilities of remediation to compensate for poor past decision-making. It would be valuable to emphasise this point in the draft strategy.</p>	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
	Page 5, para 1	The EPA would anticipate that whatever body that reports to Government regarding the triple bottom line, it would give due regard to EPA’s advice to Government. The incorporation of social assessment expertise within the EPA Service Unit would help to integrate and streamline decision-making. It would complement the other roles of the EPA as stated above.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.

Sustainability Assessment *continued*

200304162: Environment Protection Authority	Page 8, para 3	The establishment of a 'sustainability assessment' process is supported. It is anticipated that 'sustainability assessment' would dovetail with the roles of the EPA. However, it is noted that it has taken a longtime for the public to understand the roles and workings of the EPA. To date, some members of the public still confuse the DEP with the EPA. It is important that any stakeholder or public confusion is not further compounded with the introduction of 'sustainability assessment' given the statutory functions of the EPA. It is suggested that the final strategy articulates how the EPA assessment process dovetails with 'sustainability assessment'.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
	Page 9, para 2	<i>The proposal for three Sustainability Assessment Units (Environmental Protection Authority Services Unit; Department for Planning and Infrastructure; Department of the Treasury and Finance) is supported.</i> One could consider the potential consequences on 'sustainability assessment' if the Sustainability Assessment Unit is fragmented across three agencies that may have mutually different goals.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
	Page 9, para 4	The 'Sustainability Assessment Unit' should be aware of, not only Environmental Protection Policies but also National Environment Protection Measures, EPA Position Statements and EPA Guidance Statements.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
		The EPA would anticipate that the EPA Service unit would play a significant role in the above in so far as it pertains to the environment and NRM with the exception of dot point 3.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
	Page 12, second last para	EPA plays an over-arching role in NRM audit and SOE reporting. Central to those roles is the conservation of biodiversity. It would be valuable for the strategy to articulate how the EPA's roles dovetail with triple bottom line assessment as it pertains to the conservation of biodiversity.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
	Page 15, para 1	The EPA would be involved, under Pt 4 of the EP Act 1986, in the assessment of any proposal in the these categories (<i>Sustainable forestry and plantations; Sustainable mining and petroleum production Sustainable tourism</i>) which it choose to assess. Accordingly, as stated earlier, the strategy would need to clearly articulate how it is envisaged that triple bottom line assessment would dovetail with the independent assessment process of the EPA.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.

Sustainability Assessment *continued*

200303312: Department of Conservation and Land Management (CALM)	Page 4	<p>This Department currently plays a significant role in providing input to development/land use proposals via planning processes and via the Environmental Impact Assessment (EIA) process, implemented by the Environmental Protection Authority. It is considered that the EIA process is an effective means of ensuring that environmental implications are considered and accounted for in development projects. The concept of sustainability assessment, in principle, is an innovative means of coordinating social, environmental and economic implications simultaneously into the decision-making process. However, in reality, it is questionable as to what degree and by what means such a process would be carried out.</p> <p>The integration of the social component into decision-making for development proposals is much needed. However, it should be recognised that the concept of sustainability assessment, without detailed information about the process (such as triggers, the assessment process, who will be responsible for implementation), will be open to scrutiny. It is possible that the idea of 'triple bottom line' (that is, considering economic, social and environmental impacts simultaneously) will undermine the current EIA process, and reduce the degree to which the environment is considered in decision-making. This would have serious implications, given that the current EIA process in Western Australia has developed over many years to ensure that environmental impacts of projects are given serious consideration, and that the Minister for the Environment and Heritage has power in the decision-making process for project approvals.</p> <p>It is important that before the Government commits in the State Sustainability Strategy to implement a sustainability assessment process, clarity is provided on the following:</p> <ul style="list-style-type: none"> ▪ the agency responsible for administering and implementing the assessment process; ▪ how sustainability assessments made by the Environmental Protection Authority, Department for Planning and Infrastructure and Department of Treasury and Finance will be integrated; ▪ triggers for proposals to be subject to sustainability assessments; ▪ details of the process itself; and <p>how sustainability assessment will link to/complement/substitute for the current EIA process implemented by the EPA.</p>	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
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Sustainability Assessment *continued*

CALM <i>cont.</i>		<p>These points should be the subject of inter-agency discussions in order to derive an effective, streamlined process for adequately accounting for the 'triple bottom line'. It is important to emphasise that the current EIA process is relevant and valid and should not be undermined in its power in decision-making.</p> <p>The draft Strategy recognises that "<i>Agencies will need to develop a social, environmental and economic checklist and a range of techniques that can help to integrate these</i>" (page 38). It is essential that for sustainability to be adequately accounted for in decision-making, government agencies take this approach outlined in the Strategy. This Department has adopted a three year strategic planning process in its determination of funding priorities for its parks and visitor services output. This process ensures that projects are assessed against a comprehensive checklist, which already includes social, economic and environmental considerations. This is an effective approach that the Department will be aiming to apply at the Departmental level for all of its outputs.</p> <p>Strategic planning processes <i>between</i> government agencies should also incorporate an assessment against social, economic and environmental considerations. For instance, the Trails Reference Panel, which consists of members of a number of government agencies, will develop a framework under which future trails development in WA will be based. It is imperative that the Panel develops sustainability criteria against the 'triple bottom line', and ensures that the government agency responsible for each of the strategies is compliant in its assessments and recommendations. Before a clear, well-defined and agreed sustainability assessment process has been developed for State-wide projects, plans, policies and programs, all agencies should adopt an approach to consider the 'triple bottom line' in decision making at all levels, as part of the State Sustainability Strategy.</p>	<p>Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.</p> <p>Noted. The Sustainability Policy Unit will consult with agencies in the development of sustainability assessment methodologies.</p> <p>This is addressed in the final Strategy. See <i>Embracing sustainability in government agencies</i>.</p>
200303074: CALM	6, par 2	Before a clear, well-defined and agreed sustainability assessment process has been developed for State-wide projects, plans, policies and programs, all agencies should adopt an approach to consider the 'triple bottom line' in decision making at all levels, as part of the State Sustainability Strategy.	Agreed.

Sustainability Assessment *continued*

200303160: Goldfields Esperance Development Corporation	Pg. 4	<p>The proposed Social Assessment Unit in the Department for Planning and Infrastructure (DPI) and an Economic Assessment Unit in the Department of Treasury and Finance are considered positive strategies. The Units could assist agencies to address sustainability issues and assist agencies, including Development Commissions with their incorporated plans, and other agencies with their action plans. The Units would need to be inclusive of all tiers of government. There are already some achievements evident in the field and best practice examples could benefit others.</p> <p>The suggestion of a Sustainability Policy Unit, combining Industry/Government expertise is seen as a positive move. This group would be a major resource to industry.</p> <p>The GEDC fully supports this action.</p>	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
200300307: Hamersley Iron	2-5, p.2	<p>Hamersley strongly endorses the notion that establishing a coherent sustainability assessment framework should only be applied to very large projects of State significance (page 36).</p> <p>Hamersley offers its experience in developing an internal decision making process based on sustainability assessment to comment on the practicality of full sustainability assessment models (see reference to Box 7 page 37).</p> <p>As described in Box 7, Hamersley undertook a pilot program to develop a sustainability assessment process and then tested the developed methodology on a decision relating to the future direction of the company's pastoral stations. Following the completion of this phase of the program, Hamersley then applied the methodology to a more complex mining decision relating to future resource development.</p> <p>...Hamersley requests that in the final report, the last sentence of Box 7 on page 37 is replaced with "<i>Hamersley Iron acknowledges that significant resources are required to use the process and intends to use the methodology for significant development proposals rather than fully integrating the methodology into all aspects of the business.</i>"</p>	<p>Noted.</p> <p>Noted.</p> <p>This has been addressed in the final Strategy.</p>

Sustainability Assessment *continued*

200300307: Hamersley Iron	6-7, p.2	Hamersley cautions the State on the applicability of sustainability assessment through a wide range of projects, plans, policies, and programs and endorses the approach of selecting a significant case study (ie the Gorgon Project) to evaluate the methodology and determine how manageable such an approach is for mainstream adoption throughout Western Australia. Hamersley suggests that general guidelines for assessment might be useful to develop in the event that a full sustainability assessment methodology is not practical to use.	Noted.
		In the discussion on the character of sustainability assessment (page 36) Hamersley notes a reference to finding integrated solutions where tradeoffs are minimized or non-existent where possible. In Hamersley's experience, tradeoffs are more likely to exist than not, and there needs to be recognition that win-win-win against all measures is often not practical.	Noted.
	1-2, p.3	In particular, Hamersley notes the possible criteria for sustainability assessment outlined in Table 2 on page 37. Against the ecological criteria, Hamersley suggests that "reducing ecological footprint while improving quality of life" may not be the optimal measure for determining ecological impact. Against this measure a new large scale resource development project (such as a new open cut mine) could never produce a positive result. Hamersley suggests a better measure would be one that is more inclusive of total environmental impact and could assess potential environmental benefits that might come through land-swaps for conservation management, funding available for R&D projects or improved land management programs for adjacent areas.	Noted.
200303092: Housing Industry Association (HIA)	6-7, p.7	<p>The two issues are:</p> <p>1.The need for an integrated sustainability management system:</p> <p>A flaw in the arrangements proposed (page 38 refers) is the lack of coordination between the three strands suggested for sustainability assessment. Rather than having three agencies each responsible for individual assessments, there is a need for an integrated approach. The role of the planning and infrastructure portfolio (WAPC and DPI) in coordinating sustainability assessments is broader than that of social assessments under the TPD Act and that this portfolio could provide the required integrated function. The position of WALIS as an integrating tool in the transition towards sustainability also requires consideration.</p> <p>2.A Single Assessment System:</p> <p>Under a sustainability framework there is a need to integrate the approvals processes applicable to major projects and that which applies to all other or non-major projects.</p>	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.

Sustainability Assessment *continued*

200303092: HIA	p.8	<p>Major projects such as the Gorgan proposal on Barrow Island, do not include a statutory process for community or local government consultation and hence do not address social or other local issues off-site such as waste disposal etc in a manner familiar to local communities. Communities already find the planning system complex and confusing – the dual approach suggested by the draft report will exacerbate the eroding of community confidence.</p> <p>The cumulative impact of all projects should be addressed under a State Sustainability Strategy. It is the cumulative impact of major projects (eg the resource projects on the Burrup Peninsula and Barrow Island) that create impacts beyond the boundaries of the projects, such as access and community impacts on nearby towns.</p> <p>HIA recommends that industry should be included in the transitional arrangements. Table 3 (p39) for example, could be expanded to include the roles of industry bodies in formulating plans programs, policies....</p> <p>While mention is made of some industry initiatives towards sustainability in this chapter, disappointedly this does not follow through to the Vision, Objectives or Proposed Actions for governance.</p> <p>It is recommended that the final strategy include formal Government recognition of industry's leadership role by suitably adding to the Vision, Objectives, and Proposed Actions of the vital roles played by industry.</p>	
200303443: State Development Portfolio	30	In terms of the discussion on the application of sustainability principles to complex planning decisions (p.39) it must also be recognised that the use of tools such as citizens' juries and multi-criteria analysis require skilled personnel and, as such, the implementation process for the Strategy should allow appropriate resources for this to occur.	Noted.
	31	It should be noted that the proposed arrangements for sustainability assessments of State significant projects (p.39) would require considerable resources in order for the proposals to work effectively. At this point in time it is difficult to address issues associated with responsibilities and resourcing, as these matters will be considered in the procedures for implementation of the recommendations of Keating Review of the Approval Processes for Major Projects.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
	33	The discussion on the incorporation of sustainability principles into new legislation (p.40) also needs to make clear how the adoption of a commitment and comprehensive approach will occur. If new or revised legislation is to include or address sustainability principles then this must be factored in from the outset of the process.	Noted.

Sustainability Assessment *continued*

200303443: State Development Portfolio	34	Recommendation 1.2 to establish an Industry-Government Working Group on Sustainability Assessment has already been acted upon and the Department of Industry and Resources (DOIR) would seek to have a continued involvement in this forum. This commitment is being fulfilled within current resourcing allocations.	Noted.
200303073: Natural Resource Management Council	Point 8	One of the key challenges for WA in achieving a sustainable future in NRM is to have a decision making structure which is proactive and consultative, yet decisive once the debate is had. The government/community/agency interface and relationship is growing, and cooperation is developing, but it can still be difficult at times.	Noted.
200302729: Shire of Serpentine- Jarrahdale	7, pg. 3	In implementing a sustainability assessment process, the Shire believes one of the key issues is establishing a minimum acceptable standard of development and a "defined case for refusal" to ensure the status quo doesn't prevail. The process should also ensure early intervention into projects to achieve the following: Save time Deny duplication Stop independent or cross department barriers Provide certainty for applicants and decision makers alike Be cost effective Ensure that the weight given to all of the sustainability factors is equal Allow the construction of early intervention criteria to have an education effect in the first instance.	Noted.
	1, pg. 4	To achieve a true sustainability assessment there needs to equality of weighting of the environmental, social and economic factors/issues. To achieve this a social impact assessment unit, with a broad social sustainability agenda, needs to be established that can develop social indicators and undertake the social assessment in the sustainability assessment process.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
	2, pg. 4	Table 3. Proposed funding criteria for sustainability assessment Under the environment assessment objective the only natural resource to be measured is energy why aren't all resource consumption of the project considered especially water consumption but also materials consumption over the projects life cycle. This assessment framework provides the opportunity to go beyond the very limited indicator of energy as a means for assessing the environmental sustainability of a proposal.	Noted.
	3, pg. 4	The vision is to embed sustainability assessment into all levels of government. This needs to also ensure local government issues are addressed as well as larger state significant projects, there are projects that are assessed by local government that have regional and statewide implications.	Noted.

Sustainability Assessment *continued*

200302729: Shire of Serpentine- Jarrahdale	4, pg. 4	The Shire supports the establishment of a sustainability assessment frameworks as an excellent means of achieving optimal outcomes in large developments. The assessment framework should ensure it gives clear direction for both government agencies assessing the proposals but also for applicants preparing submissions and for the general public to interpret.	Noted.
	5, pg. 4	The current proposed actions focus on state government assessment of major development projects. There also needs to be the development of a sustainability assessment framework for smaller projects that is aimed primarily at local government assessment. This would help guide local governments in assessing all their projects based on sustainability and would provide a more cohesive approach to development across the state.	Agreed. This would be addressed by the Sustainability Scorecard approach. See <i>Sustainability assessment</i> .
	6, pg. 4	Indicator that could be added are: *Number of sustainability Assessment Completed *Number of state agencies that have integrated sustainability assessment into their assessment processes for all projects in all departments. *Number of Local government Authorities that have adopted a sustainability assessment framework for assessing development applications	All indicators and targets have been removed from the final Strategy.
200302774: Waste Management Association	3-4, p.7	The use of " <i>sustainability assessment</i> " for new projects appears reasonable. Although we agree with the proposed action to establish an industry-government working group on sustainability assessment, the proposal to use three separate "Sustainability Assessment Units" in three separate Government Departments (DEP, DPI & DTF) would be an unworkable situation and would deter companies developing new projects and technologies in Western Australia. It is suggested that one unit be established in one agency – suggest DEWCP or DPC (like NSW, VIC, QLD and recently SA). The unit would manage and act upon any actions from the Sustainability Strategy.	Noted. Final arrangements for undertaking sustainability assessment are yet to be determined.
200303590: WA Collaboration	Rec. 5	Recommendation 5 Interim Social Impact Assessment process As an interim measure towards a comprehensive Social Impact Assessment process which would feed into a Sustainability Assessment structure, all State budget revenue proposals should be subject to a social impact assessment to ascertain whether separately or cumulatively they impact unfairly on low-income families and individuals, particularly those experiencing multiple layers of disadvantage as a consequence of gender, disability or ethnicity. As a guide, rises in taxes and charges should be kept at or below the Consumer Price Index for low income families and individuals. All State budget revenue proposals should be subsequently modified if they can be shown to disadvantage this target group.	Noted.

Sustainability Assessment *continued*

200303590: WA Collaboration	Rec. 31	Sustainability assessments The State Government should develop processes for performing sustainability assessments on all significant new and existing policies, programs, legislation and proposals.	See <i>Sustainability Assessment</i>
200303076: WA Sustainable Energy Association (WA SEA)	2-3 p.3	<p>While WA SEA supports the concept of 'sustainability assessment', there needs to be a direct benefit delivered to projects that meet the criteria. There is a very real danger that such a procedure can (unintentionally) make it harder for sustainable projects to navigate the approval process, when compared to non sustainable projects, by putting in place additional hurdles and raising the bar height. Proponents that successfully navigate the process and meet the additional criteria can then find themselves back at the starting line with standard projects (unsustainable projects). This could add significantly to "regulatory risk" and frustrate companies developing sustainable projects and technologies in WA.</p> <p><i>It is also of concern that the use of three separate and uncoordinated 'Sustainability Assessment Units' would be a poor use of resources and against Government's trend to streamline. This will attract negative attention from stakeholders and could perpetuate the myth that sustainability is costly and a luxury that society must make sacrifices to enjoy.</i></p>	<p>All projects (including Sustainable energy) need to incorporate social and economic net benefit into their proposals as well as environmental</p> <p>Integration will occur.</p>
	3, p.3	<p>WA SEA believes there is a need for the establishment of one Department or Agency to act as a liaison point to all other agencies. This will enable companies to deal with one Agency only. Sustainable energy projects need assistance to get through the complexities of the development stage. The Agency, which acts as a central liaison point to other agencies will act as a champion to assist sustainable energy projects in getting through the bureaucratic red tape which often serves to stall project development.</p> <p>Following from the above point, WA SEA believes projects that have a clear sustainability focus and meet triple bottom line requirements should be deemed 'Projects of State Importance' and be given assistance, via an internal project champion, through the development process. The project champion could come from within the newly created Department of Industry and Resources (DoIR). Members of DoIR's environment team have already provided this type of assistance in the past. The establishment of a single liaison Agency will facilitate this process.</p>	DOIR will remain the facilitator of complex or strategic projects.
	5, p.7	Action 1.2:...request that WA SEA is provided the opportunity for representation on this working group.	The Working Group was open to any and all industry participants.

Sustainability Assessment *continued*

200303354: Western Power Corporation	8	The establishment of Social (Dept for Planning & Infrastructure) and Economic (Dept of Treasury & Finance) assessment units to work contemporaneously with the Environmental assessment unit in the EPA is a recognised step in establishing a State capability for integrated sustainability assessment of new projects, programs etc. However, the very nature of sustainability considerations is that there will often be conflicting principles, and if the assessment process is to be effective, the units will require policy guidelines from Government that have themselves been subject to sustainability assessment in their formulation. This will presumably be facilitated by the Sustainability Policy Unit in the Dept of Premier & Cabinet, but the present strategy elements appear to be aimed at Government agencies and the legislation they administer	See <i>Sustainability Assessment</i> .
	9	The Strategy would benefit from consideration of actions to consolidate over arching State direction on sustainable development – a pre-requisite for the agencies to develop their own implementation planning. This also extends to Government Trading Enterprises where, for example, the Government's sustainability principles would need to be reflected in its expectations of GTE performance.	This is addressed by the Sustainability Act and the Sustainability Code of Practice for Government Agencies. See <i>Embracing sustainability in government agencies</i> .
	10	The "Roundtable" concept to promote sustainability outcomes in planning is a good one, but as proposed in the consultation paper it appears very government oriented (e.g. its title is "State-Local Government Roundtable"). For this concept to be effective, other sectors would need to participate in the roundtable – not "worked with".	A Sustainability Roundtable will be established with broad representation. See <i>Institutional change</i> .
200300358: F. Schnattler	Sec. 3.0, pg. 1	Provide transitional arrangements for quintuple bottom-line assessment including the establishment of five independent assessment units in order to be able to address effectively and efficiently BEvolutionary 'change' conceptually and systematically. Finalise by the end of 2005. Names of Assessment Units: 1) SEENergy Assessment Unit (SEENergy, or Social, Ecotechnical, Envirotive, and Normative Synergy, view) 2) Social Assessment Unit (Single view) 3) Ecotechnical Assessment Unit (Single view) 4) Envirotive Assessment Unit (Single view) Normative Assessment Unit (Single view)	See <i>Sustainability Assessment</i> .
	Sec. 3.0, pg. 2	Establish five Community-Industry-Government working groups to develop decimal-based assessment concepts and systems on BEvolution that can deal effectively and efficiently with BEvolutionary 'change' (see also page 1).	See <i>Sustainability Assessment</i> .

Sustainability Assessment *continued*

200303090: Woodside Energy	p.13	<p>In Woodside's view, a sound assessment process should be:</p> <ul style="list-style-type: none">• Effective – to manage all of the key issues• Clear – to ensure that the process is easy to understand• Consultative – to involve the community in decision-making• Efficient – to allow for timely and economic planning• Flexible – to make the assessments relevant to the projects <p>One of the most important elements of efficiency in the approval process is the consolidation of the assessments. Neither community nor business interests are served by a complex sequence of procedures and reviews. Wherever possible, assessments should be part of a single logical process. If multiple assessments are unavoidable, the reviews should be managed concurrently.</p> <p>At present, the State Government is implementing a reform program for Western Australia's project approval process. Many of the reforms have broad industry support. However, there are serious concerns about a move towards less flexible and more rigid assessment of selected major projects. Industry would strongly oppose the introduction of more prescriptive and bureaucratic requirements for sustainability assessments.</p>	<i>See Sustainability Assessment.</i>
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Institutional Change

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	13	The additional tasks proposed to be undertaken by the Sustainability Policy Unit to implement the State Sustainability Strategy (Actions 1.3 and 1.4) aim to achieve a whole of government approach to sustainability and will more clearly define the role of Local Government in this process.	Noted.
200300298: Information for Action	11	The Government is making a big deal about its commitment to sustainability but it is not delivering enforceable hard laws. And the promised shift towards sustainability is not being applied throughout all Government departments. 'Growth at any cost' is still the policy of most Ministers and agencies.	The final Strategy includes provision for a Sustainability Act. See <i>Institutional change</i> .
	12	Many agencies are still trying to fast-track assessment processes and support energy hungry, greenhouse gas emitting developments. The Government should work more to attract and support industries that fit in with the sustainability values proposed in the draft State Sustainability Strategy.	Noted.
200300308: Shire of Kalamunda	3	It is important to not only involve local government in the development of such policies but to listen and take on board any comments raised to establish an effective working partnership between state and local government.	Agreed. The final Strategy contains an action (1.21) that will see the development of a protocol to facilitate communication and discussion between DOIR and relevant local governments in relation to significant projects. See <i>Partnerships for action</i> .
200300261: City of Albany	13	The Strategy does not include a section on relationships with the Federal Government. There is a need to include an action for the West Australian State Government to lobby the Federal Government to sign the Kyoto Protocol and to develop a national framework (including national indicators) for sustainability.	Noted.
200300305: The Institution of Engineers, Australia.	28	The developing of a Sustainability Code of Practice and Resource Guide is noted. This is to be applauded. The WA Government should note and take account of the Institution's guide to Sustainability for Engineers, 'Towards Sustainable Engineering Practice' developed in 1997. This may serve as a useful example and template of a working guide to sustainability in practice.	Noted.
200300368: City of Kalgoorlie- Boulder	2	There is scope for the Sustainability Policy Unit to provide guidance, and to work with, the Local Government Association, particularly disseminating information regarding general policy advice and community education programs.	Noted.

Institutional Change *continued*

200302959: City of Fremantle	10	Institutional change...State Government should lead this process throughout both state and local governments and the objectives and proposed actions in this section should reflect this.	Noted.
200302960: Urban Development Institute of Australia	19	UDIA strongly believe that any sustainability initiatives undertaken by Western Australian government departments or agencies and local government authorities should be consistent with and underpin the DSSS, particularly in regard to key issues such as 'Sustainability and Settlements' and 'Sustainability and Community'. We therefore request that the DSSS, its philosophy and main objectives are reviewed against and other departmental policy and statements to ensure a more concise, consistent, 'whole of government' position on the issues of sustainability.	Agreed.
	28	Institutional or legislative change should not occur before sound analysis of the strengths and weaknesses of the current processes and the opportunities for changes which will contribute to achieving more sustainable outcomes.	Agreed.
200302850: City of Mandurah	23	It is understood that the practical implementation of the Strategy will be difficult. The Strategy needs to be embodied in the basis of operation for all State Government Departments and instrumentalities.	Agreed.
200303065: City of Gosnells	11	The challenge of institutional change is faced by all levels of government with the existence of different levels of understanding and appreciation of the concept of sustainability. Moreover there is a risk of having varied groups seeking to skewer the rationale based on area of interest. The most fundamental tool in operationalising such institutional change is linkage to budgets, agreed measurement/assessment tools and comprehensive education programs.	Agreed.
200217800: Michael Bell	8	One environmental agency I know of has the capacity to carry out environmental protection measures now, according to the Act, but is willing to trade off the environment because they mistakenly think litigation will result if they act to protect the environment! (or at least that is the story they are spinning)	Noted.
	10	It would appear that some agencies are unaware of State, Commonwealth and International agreements that currently bind them to environmental agreements.	Noted.
200300357: Water Corporation	27	A suggested improvement for the indicator and targets set out on page 44 is "Number of agencies with a process to ensure all areas within the organisation making policy include sustainability criteria." The making of policy to reflect sustainability criteria should not be limited to a single function or group but should be the responsibility of all groups across an organisation that makes policy.	All indicators and targets have been removed from the final Strategy.

Institutional Change *continued*

200301473: North Lake Residents Association	29	<p>The way forward with regard to the issues and concerns held by our community, is that a process be put in place, or if necessary the Act be amended, whereby the Environmental Protection Authority (EPA):</p> <ul style="list-style-type: none"> * Improves the quality and quantity of information required for environmental assessments. * Includes assessments which are not merely impact oriented. That is, a definitional change could be made. The language and function of the approach to assessment would alter. Terminology would become more inclusive and equitable. <p>Currently a 'proponent' is often in fact, an <i>opponent</i> of an ecosystem, whilst also being a proponent of environmental impact. For the term 'proponent' to become more inclusive, there has to be clarification of the nature of action available to the community. Either government or community agencies could then pro-actively request the EPA to conduct terrestrial biological and aesthetic surveys.</p> <ul style="list-style-type: none"> * Acknowledges a major policy shift is needed to redress the current imbalance between – advocating for environmental conservation <i>and</i> proposing environmental impact. * Acknowledges that through the right of proponents, significant Bushplan areas (such as MRS Road Reserves) could be vested in the community. For example, Road Reserve land through the Beeliar Regional Park could, within a process of community proponents, be advocated as integral to the lakes' ecosystem and significant for future generations. * Reviews progress in the implementation of <i>The Wetlands Conservation Policy for Western Australia</i> with specific reference to the progress made by government agencies responsible for the actioning or objectives 1.1 through 1.21. This set of policy objectives is laudable, in that they speak directly "<i>to preventing the further loss or degradation of valuable wetlands and wetland types, and to promoting wetland conservation, creation and restoration</i>" (<i>The Wetlands Conservation Policy For Western Australia</i>, 1997:10). 	Noted.
	43	<p>Community Reference Groups needs to be a part of the planning process. Currently the Act requires a 'trigger' (such as an application by MRWA to use an area for road construction) before the EPA responds.</p>	Noted.
	44	<p>Coordination is needed of those government agencies responsible for the implementation of the WA Government's Wetlands Policy. This involves authenticating MOU's across agencies, monitoring progress, and providing transparent links between departments, so as to accomplish current policy and outcomes. Cost benefits and accountability within and between agencies (ie EPA, DEP , CALM, WRC, Local Government, Planning, Transport and MRWA) is essential, to achieve policy objectives.</p>	Noted.

Institutional Change *continued*

200303161: William (Bill) Grace	13	<p>Note: see original document for details</p> <p>With the exception of representation for the Minister of State Development, the WAPC has the coverage necessary to holistically oversee the introduction of sustainability into the State's administrative agenda. Of all the existing bodies in the State Government, the WAPC remains the most logical conduit for implementation of much of the State Sustainability Strategy. The major instrument proposed for introducing many of the initiatives are Statements of Planning Policy, which are of course under the control of the WAPC.</p> <p>If the WAPC is not given such a role, it is difficult to see how many of the proposed sustainability objectives can possibly be met.</p>	The final Strategy places increased emphasis on the role of the Western Australian Planning Commission in supporting sustainability in Western Australia. See <i>Sustainability and settlements</i> .
200303348: Conservation Council of WA	4, par 5	<p>Recommendation</p> <p>The Council believes that the most effective way to progress sustainability in WA is to give ultimate responsibility for coordinating and driving sustainability to a single agency, a Sustainability Commission. The functions of a Sustainability Commission would include responsibility for:</p> <ul style="list-style-type: none"> ▪ the provision of an overview of sustainability performance, similar to that performed by the ACCC; ▪ the provision of information on integrated assessment of proposals to Cabinet; and ▪ auditing and reporting on performance of Government departments and agencies against sustainability indicators, targets and milestones. 	Noted. A number of these functions will be undertaken by the Sustainability Roundtable.
200303048: Conservation Commission of WA	4, pg. 12	The Commission therefore recommends that the institutional reform work on sustainability assessment being undertaken by the Department of the Premier and Cabinet, and by SIAC in its implementation of Recommendation 56 from the Keating Review, be brought together into one coordinated effort through the establishment of a Sustainability Assessment Institutional Arrangements Committee. It is further recommended that this committee be made up of officers from the Department of the Premier and Cabinet, the Department of Industry and Resources, SIAC, and other relevant Government bodies such as the Commission, the EPA, the Department of Conservation and Land Management, and the WA Planning Commission. The Final Sustainability Strategy could present Terms of Reference for this group, which should report within 6 months of the Strategy being adopted.	Noted. The Ministerial Steering Committee for the Review of the Development Approvals System will be responsible for determining the final arrangements for sustainability assessment of complex or strategic projects.

Institutional Change *continued*

200303348: Conservation Council of WA	4, par. 6	<p>Recommendation</p> <p>We realise it will take sometime to establish the Sustainability Commission, we therefore recommend that SSS further develop a model to be used as a transition approach, which includes the following:</p> <ul style="list-style-type: none"> adequate funding for the Sustainability Policy Unit and the other Policy Units in Premier & Cabinet supporting the Cabinet Standing Committees be provided; all Government departments will need to assign adequate resources (e.g. 1 key staff member) to "incorporate sustainability capacity into their policy functions" (Proposed Action 1.4); and <p>Mechanisms be developed for these assigned staff from departments and the Sustainability Policy Unit to communicate effectively, report on progress and have blockages dealt with at a high level.</p>	Noted. This will partially addressed through the development and implementation of the Sustainability Code of Practice for Government Agencies.
200302948: Environmental Defenders Office	Page 1, para 2	Legislative reform will, in fact, be essential to the implementation of sustainability, and the final Strategy should therefore include recommendations for such reform. The reform should not simply focus on environmental legislation (which has traditionally been the primary forum in which sustainability is addressed), but should address legislation in all sectors. The magnitude of the changes that are needed in social and economic, as well as environmental, policy and legislation means it will not be sufficient to leave traditional environmental legislation to deal with sustainability.	The final Strategy includes the development of a Sustainability Act the review of relevant legislation. See <i>Institutional change</i> .
	Page 1 and 2	<p>The final Strategy should recommend that the principle of sustainability be inserted as the object of all relevant legislation. ... When inserting the principle of sustainability into legislation, care should be taken to ensure that the principle does not conflict with any other the other objects of the legislation. Objects clauses which conflict with each other either cancel each other out, or in some cases, one objects clauses is preferred above another and the other object is simply dismissed.</p> <p><i>Various legislative examples are given.</i></p> <p>In the event that there is a potential conflict, this can be resolved by providing that the principle of sustainability has primacy and is to be preferred in the case of any conflict.</p>	Agreed.

Institutional Change *continued*

200302948: Environmental Defenders Office	Page 2, last para	<p>.... there should be a review of all legislation to assess its compliance with sustainability principles and to recommend ways in which such legislation could be reformed to ensure the implementation of sustainability.</p> <p>Reform of legislation should address:</p> <ul style="list-style-type: none"> • Development of, and public participation in development of, a Sustainability Framework which incorporates sustainability principles, targets and measures; • Requiring all relevant sectors to comply with the Sustainability Framework; • Requiring all decisions to be made in accordance with sustainability principles and the Sustainability Framework; • Requiring agencies to prepare and publish formal reasons for their decisions; • Permitting third parties to bring actions to review whether decisions and actions are in accordance with sustainability principles and the Sustainability Framework; • Providing formal mechanisms for public involvement in all decision making; and <p>Penalties and enforcement for non compliance (including third party enforcement).</p>	Noted.
	Page 3, para 2	<p>An independent statutory Sustainability Commission should be created to develop and implement sustainability objectives. Specifically, the Sustainability Commission should:</p> <ul style="list-style-type: none"> • Be responsible for preparing a Sustainability Framework which incorporates sustainability principles, targets and measures; • Be responsible for promoting sustainable development in Western Australia; • Promote law reform to implement sustainability; • Report to Parliament on the performance of government agencies and relevant sectors in applying sustainability principles; • Educate decision makers about sustainability; • Provide advice on the sustainability of major proposals; and • Track Western Australia's progress against sustainability indicators. <p>A Sustainability Commission such as the one proposed should be created by statute as an independent, well resourced body. Legislation should determine the make-up of the Commission, its powers, and its relationship to other Government agencies. Legislation should allow the proposed Commission to require inputs from other government agencies, Ministers and local governments, and to monitor those bodies', and the community's, progress to sustainability.</p>	Noted. The Sustainability Roundtable will under some of these functions.

Institutional Change *continued*

200302948: Environmental Defenders Office	Page 4, last 3 paras	Implementation of the final Strategy will require decision makers to make decisions in accordance with sustainability principles. These decision makers should be required to provide readily available public reasons for their decisions.... Reasons for decisions should be made a part of a comprehensive public record of sustainability decisions. Such a record of reasons will ensure that the public is informed of decision makers' actions, will form a valuable body of precedent, and will also assist government departments in making consistent and efficient future sustainability decisions.	Noted.
	Page 5, para 1	Any legislative and/or institutional change must include ample opportunities for public participation in sustainability decision making. Not only is the public an integral part of sustainability, they are a vital source of knowledge about sustainability and will bring different and valuable perspectives to sustainability decisions. Effective provision of public participation requires formal legislative rights to participate, access to all relevant information and capacity building.	Noted.
200303160: Goldfields Esperance Development Corporation	Page 4	The concept of a partnership with the WA Local Government Association (LGA) is important as LGAs play an important role within regions. The GEDC works closely and successfully with the LGAs. We would ensure they are included in the formulation of our incorporated plan. The local Government Sustainability Roundtable is also seen as positive. In Kalgoorlie-Boulder the GEDC participates in the Mayors Leadership Group that addresses issues identified in the community. The importance of a partnership approach across government boundaries cannot be emphasised enough.	Noted.
200303443: State Development Portfolio	36	The Strategy could propose an important role for the SPU in convening various forums and seminars that canvas issues associated with conducting sustainability assessments. Similarly, the SPU could look towards the development of new training programs for public sector officers who will be responsible for conducting sustainability assessments.	Agreed. See <i>Embracing sustainability in government agencies</i> .
	37	Another important aspect to be considered is the requirement that all agencies develop internal forums or groups to be able to consider the issues associated with sustainability assessments. Building capacity in these areas will not occur if individuals act in isolation. It can only fully develop through the sharing of ideas, techniques and skills. The establishment of formal and informal networks across Government is therefore encouraged to allow the transfer of information.	Agreed.

Institutional Change *continued*

200303073: Natural Resource Management Council	Point 5	The Strategy currently is a list of actions with no clear institutional structure apparent to take on the responsibilities for implementation and monitoring. Allocation of tasks to a group is necessary. These groups could be agencies, local government, community groups, service clubs, etc. It is recommended that existing structures be used rather than creating new ones. Peak groups could act as custodians or patrons to ensure work is performed effectively. Council is also concerned as to how the actions will be fed into the community and how the established voluntary NRM community structure will be used. Members suggested that biting off small pieces at a local level for local implementation could be successful. It was also suggested that a good communication strategy be developed to advise community about the Strategy and their role in implementing it. Council sees that the key points are that someone needs to be designated as responsible for each agreed action, and also that a reporting mechanism needs to be put in place to ensure implementation occurs.	This has been addressed in the final Strategy.
200302729: Shire of Serpentine- Jarrahdale	1, pg. 5	The vision should also incorporate that all government agencies have sustainability as their overarching framework. There is a role in the formative years for sustainability units to be established to guide the cultural change and process change that is required to integrate sustainability into the core of business. In the long term the vision should be that sustainability is part of every agencies and every department within that agencies.	Noted.
	2, pg. 5	An additional action should be to assist agencies to integrate sustainability into all of their actions, policies and procedures.	Noted.
	3, pg. 5	Action 1.4 notes to "assist relevant agencies to incorporate sustainability capacity..."sustainability is relevant to all agencies, the vision and therefore the actions should aim to achieve sustainability as the framework upon which the agencies function	Noted.
	4, pg. 5	To achieve integration of sustainability into all government agencies there will need to be cultural shift and also strong leadership. To achieve this leadership and integration the integration of KPI's on sustainability should be incorporated into the job requirements of CEO's of all government agencies.	Noted.
	5, pg. 5	An additional indicator could be the number of agencies with a sustainability culture.	All indicators and targets have been removed from the final Strategy.

Institutional Change *continued*

200304161: WA Farmers	3, p.3	WAFarmers has expressed concerns over recent times that the State Government's Machinery of Government process has disadvantaged rural Western Australians through taking resources from rural-oriented departments, shift from consultation to regulation, decline of staff morale, less access to decision-makers, environmental bias (not TBL). see document for details ... Regrettably, there are indications within the State Sustainability Strategy that the concerns highlighted herein will be continued, albeit in a more formalised manner.	It is unclear as to how the State Sustainability Strategy would continue the concerns highlighted, in particular the importance of TBL synergies is clear in the Strategy
200303590: WA Collaboration	2, pg. 4	While this section is called Institutional Change, there is actually little institutional change contained in the recommendations. This is a critical aspect of any Sustainability Strategy – putting into place the institutions and structures that will drive sustainability into the future.	See <i>Institutional change</i> .
	Rec. 25	<p>Sustainability Commission Establish an independent statutory authority, a 'Sustainability Commission', that is representative of government, industry and the community, with the following terms of reference:</p> <ul style="list-style-type: none"> a) to provide advice and assistance to the State Government, and report to the State Parliament on moving towards sustainability, including regular reviews and refinements of a State Sustainability Strategy; b) to coordinate the implementation of the State Sustainability Strategy, and other relevant efforts towards achieving sustainability; c) to publicly advocate and actively promote sustainability; d) to report, at least annually, on progress towards sustainability across government, the community and private sectors; e) to establish sustainability indicator systems that are clear and accessible and that enable government and the community to gauge progress across the social, environmental and economic dimensions of sustainability; f) to investigate and research progress towards sustainability, and how this can be best achieved; g) to audit the performance of State Government agencies, authorities and publicly owned corporatised organisations, against their respective sustainability policies and objectives, and report to State Parliament on these audits (see Recommendation 29 for more detail); and h) to coordinate education programs for primary, secondary, tertiary and adult education sectors and the general community to support the Sustainability agenda. 	The final Strategy establishes a Sustainability Roundtable which will undertake a number of the functions proposed for the Sustainability Commission.

Institutional Change *continued*

200303590: WA Collaboration	Rec. 25	It is recommended that the proposed Sustainability Commission: <ul style="list-style-type: none"> i) should be established through the passing of a Sustainability Act; ii) the Commission would be required to report to both the Premier (or Minister for Sustainability) and to State Parliament; iii) should have at least three full time Commissioners with an appropriate range of expertise taking into account the Commission's terms of reference; iv) should receive its own budget adequate to fulfil all of its legislative responsibilities; and v) should receive administrative support from the Department of Premier and Cabinet. 	
	Rec. 26	Sustainability Act Establish a 'Sustainability Act' that provides for a Sustainability Commission, the powers it would require, and the terms of reference as set out in Recommendation 25 above.	The final Strategy provides for the establishment of a Sustainability Act.
	Rec. 27	Ongoing review of institutional reform Both the State Sustainability Strategy and the Sustainability Commission should identify processes for ongoing review and exploration of what institutional reforms would best support the Sustainability Agenda. This would include, but not be constrained to, institutional structures.	The State Sustainability Strategy will be reviewed every two years. This review provides the opportunity to consider any institutional reform.
200303076: WA Sustainable Energy Association (WA SEA)	p.14	<i>'Number of agencies with sustainability policy functions.'</i> (Page 44) Comments: WA SEA believes this to be a poor indicator of Institutional Change. <i>'Number of public servants with sustainability expertise and experience.'</i> (page 44) Comments: WA SEA believes that Central Tafe be responsible for developing and implementing training courses for public servants, town planners etc. WA SEA recommends that the additional indicators to be included in the Governance section. (Page 50) <ul style="list-style-type: none"> · Number of government departments that purchase renewable energy from ORER accredited generators · Number of GWh of renewable energy purchased by Government Departments and also present this information as a percentage of the total · Greenhouse gas emissions savings resulting from the purchase of renewable energy · 30% sustainable energy use by all Government Departments by 2010. 	All indicators and targets have been removed from the final Strategy.

Embracing Sustainability in Government Agencies

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	14	The incorporation of sustainability principles in legislation up for review or drafting (Action 1.5) and the development of a Sustainability Code of Practice (Actions 1.6 and 1.7) will assist State Agencies and Local Governments in determining how to "operationalise" sustainability. To facilitate this process, the State Government proposes to develop a Sustainability Resource Guide to assist in the preparation of Sustainability Action Plans.	Noted.
200218455: Ord-Bonaparte Programme	33	The role of government is to lead the community in ensuring that ecological sustainability is the principle underpinning development. Government can facilitate change to a society founded on principles of sustainability through the development and implementation of necessary law, policy and institutional change.	Noted.
200319280: City of Swan	20	The development of a Sustainability Action Plan is a significant step towards incorporating Sustainability principles into agency programs and activities. It must be ensured that the focus of these action plans is not only environment but broad also considers the social and economic implications of their operations.	Noted.
	21	The Sustainability Code of Practice will assist in some consistency in policy making and practices that will be needed to guide these agencies through the familiarization stage of the issue.	Noted.
200302880: City of Wanneroo	24	Action 1.7 - Other initiatives that could be included on this list include support for Greensmart which is being developed by the Housing Industry Association, developing a State Government Environmental Management System, and support for eco-efficiency and cleaner production.	Noted.
200300305: The Institution of Engineers, Australia.	29	The Code of Practice will serve as a focal point for sustainability within Government. This coupled with the Sustainability Procurement Process should be used as a basis of influencing the private sectors sustainable practices. The Code of Practice should include a section specifically targeted at the expectations or practices of contractors working for Government. This can be used by Government to set contract conditions on supplier behaviour.	Sustainable Procurement will be primarily addressed through the Sustainability Procurement Policy. See Embracing sustainability in government agencies.
	30	It is essential that present institutional impediments to more sustainable performance in schools and other Government institutions be removed. At present the Education Department pays for the energy used in air conditioning systems in those state schools where parents can afford to purchase the systems, but will not pay to have insulation and energy conserving equipment or alterations effected. This perpetuates the ongoing use of energy when energy conserving measures could have been alternatively employed. This is not considered sustainable.	Noted.

Embracing Sustainability in Government Agencies *continued*

200300368: City of Kalgoorlie- Boulder	3	It is noted that many of the proposed actions will require the input from local government, such as building design and construction, and that the principles of the Sustainability Code of Practice, Action Plan and Sustainability Resource Guide could be beneficial to local government. Local government also plays an important role in administering legislation and therefore should be afforded the opportunity to comment on the draft legislation.	The Draft Code of Practice for Government Agencies will be available for comment.
200300357: Water Corporation	30	(Referring to Box 10, p48) Although a laudable goal, this presumes that energy is being wasted and that such energy savings can be achieved through various efficiencies. However, in the Corporation's case these energy saving goals do not take into account the business expansion in provision of essential services and the pressure for increased levels of service and more energy intensive solutions. The strategy does not acknowledge that the Water Corporation and its predecessor, the Water Authority, have had a long history of attention to energy efficiency, and that the Corporation's current operations result in its greenhouse gas emissions being 25% lower than the 'business as usual' case.	Noted.
	31	Action: acknowledge that some sectors cannot be expected to meet these goals.	Noted.
200302946: LandCorp	9	Initially there will understandably be attempts by agencies to manage expectations of regulating Departments, Ministers' Offices and the general public by setting readily achievable targets and 'green-washing' their performance.	Noted.
	10	To encourage more challenging strategies and stretch targets in subsequent years, the Department of the Premier and Cabinet should consider facilitating a support network of sustainability 'champions' in major Departments, Agencies, Offices and branches supported by an organisational development practitioner. Access to experts in technical issues via such a virtual 'centre of excellence for policy' may also speed the State sector's journey towards greater sustainability.	This is supported in the final Strategy. <i>See Embracing sustainability in government agencies.</i>
200302856: City of Stirling	7	Although it is accepted that sustainability processes are not necessarily the same for all agencies, it is important to achieve optimum efficiency by avoiding duplication of similar procedures. The Strategy could have a stronger focus on information sharing and standardised procedures between government agencies and between government agencies and local government. Examples of information sharing could include best practice on sustainability assessment, green purchasing and annual environmental performance reporting. Designing these systems is resource intensive and requires some specialist skills that are not always available within all organisations. The Sustainability Code of Practice provides a mechanism to introduce standardised procedures. <i>This action is generally supported.</i>	Agreed.

Embracing Sustainability in Government Agencies *continued*

200302954: Fremantle Ports	4	The Government wide commitments contained in Box 10, like the majority of the consultation draft, appear to focus on environmental initiatives as opposed to the social and economic dimensions of sustainability and how to balance and maximise all of these dimensions. There is no doubt that a key aspect of the strategy needs to be government 'buy-in' and demonstration of commitment through improvements in the very visible areas such as energy and waste, and that this should motivate everyone to tackle harder issues. However, I suspect the greater challenge (and perhaps the area where government agencies will require greater assistance), lies in developing appropriate social objectives and processes for balancing these with the economic and environmental objectives. For example, the move towards alternative fuels and means of travel (although perhaps not a major component of the overall strategy) may have associated higher risks for public safety. Will the shift to LPG vehicles increase the risk of fire/explosion? Does it bring higher cumulative risks to the community through increased storage, transport and refuelling? Are LPG vehicles involved in accidents more prone to fire explosion? Does the move to public transport increase the risk to patrons (real or perceived) particularly after dark? The question is how do these social impacts (and perhaps other economic impacts) get addressed so that the outcomes in each dimension are maximised and improved?	Noted.
	5	Without wishing to dwell on Box 10 commitments, I am concerned that initiatives such as annual energy savings, often offer little recognition to prior improvements that agencies may have implemented in recent years. I believe that, in this area particularly, improvements made by agencies over the last 2 –3 years should be included in a cumulative target reduction for the period 2006-07.	Noted.
	6	The other questions that arise relate to the actual quantification of the energy savings. Is it a raw consumption figure, an expenditure figure, a consumption per FTE, consumption per floor area etc?	Noted.
	7	Overall, in respect to the commitments, where specific numerical targets are proposed, it would appear appropriate that the principles of sustainability be practised so that the objective becomes one of learning to apply sustainability, rather than simply the pursuit of a target figure.	Noted.
	8	I agree that the use of government's purchasing power is an excellent tool to demonstrate leadership and commitment in sustainability. Again, agencies will require good advice and support for this to be successful.	Noted.

Embracing Sustainability in Government Agencies *continued*

200302954: Fremantle Ports	9	It is perhaps the government's role in planning that presents the greatest opportunities for the visible application of sustainability principles. The consultation draft presents an excellent example of the application of sustainability principles to the planning process, through the Freight Network Review [p.143 also]. The process of engagement with stakeholders, developing an understanding of what sustainability means to them, exploring the environmental and economic issues, and then identifying options that maximise the outcomes for each of the three dimensions is one which should be highlighted and developed further.	Noted. The final Strategy further addresses the role of planning in supporting sustainability.
	10	Hence, I believe it is critical that there be a focus on the development of planning processes that enable decision making to be based on sustainability principles and that stakeholder confidence is built for such processes. Each of the dimensions are multi-layered (eg. social impacts at a local level may be different to those at a regional level and national level etc), giving rise to a complex matrix for the decision making process. I believe it is this area that requires greater exploration and guidance so that government agencies can competently demonstrate the application of sustainability.	Agreed.
200311216: Zoe Moore	17	Perth Zoo dealing with symptoms of mass species extinction is essentially unsustainable CALM quote: 'most (!) Departmental locations recycling'? 'Most' is certainly not good enough, as an example to the wider community or as demonstrative of environmental commitment.	Noted.
200302959: City of Fremantle	10	The State government again should lead and support programs, with resourcing, that allow local governments to embrace sustainability. The Sustainability Code of Practice appears to hold a great deal of hope is doing this and local government should be involved in this process and be able to apply the Code of Practice in their own operations if they choose to.	Agreed.
200303160: Goldfields Esperance Development Corporation	Page 4	The Sustainability Policy Unit could provide assistance to agencies. It is unclear whether the unit would perform a monitoring role, or a legislative basis.	Noted.

Embracing Sustainability in Government Agencies *continued*

200304379: DEWCP	2, par 2	<p>The Vision – Implementation – Performance Audit Feedback Loop</p> <p>The Strategy needs to be clear about the inter-relationship between 3 key areas:</p> <ol style="list-style-type: none"> 1. Development of a Vision, Environmental Values and Targets (through a community consultation process), which set the desired outcomes of the Strategy; 2. Implementation of an Action Plan that is sufficiently funded, shows timelines, and notes which agency(s) is responsible for which action; this also needs to be well-coordinated between Government agencies and between Government and the community; and, 3. Completion and publication of periodic performance audits on Action Plan/Targets (e.g. for environmental performance, the EPA can conduct NRM Audits and SOE reports), followed by adaptive management to refine procedures and improve performance (see also Item 24 and p 49 of Strategy on triple bottom line reporting). <p>A figure to show this inter-relationship would be helpful as well (or adjust Figure 1 on p 27).</p>	Noted.
	11, par 3	<p>Some agencies, including the DEP and WRC, have developed policies such as the eco-office program (under the previous Government) or commenced this task. Both the <i>modus operandi</i> and the policies developed (or being developed) should be reviewed for consistency with present Government policy, with the eco-office initiative used as a model. Agencies will need the assistance of the Sustainability Unit to develop and implement Sustainability Action Plans in a standard format. DEWCP is currently developing a new Strategic Direction, in consultation with the community, which will aid in this process.</p>	Agreed.
200302855: Planning Institute of Australia	16	<p>The document does not emphasize that the implementation of the Strategy will involve substantial commitment of public resources to provide the necessary data and skills for the improved assessment of plans and proposals required particularly at the state and local government level. In a political environment which repeatedly calls for less regulation and less resourcing of public agencies, these are potentially contentious issues. It is possible that if these two underlying and potential contentious recommendations were clearer in the Strategy, it may have attracted more media and public interest and debate.</p>	Noted.
	31	<p>In addition to the recommendations in the Strategy, State Government can demonstrate leadership in this area by the development of initiatives such as green purchasing, sustainability assessment techniques and sharing of all this information</p>	This is supported in the final Strategy.

Embracing Sustainability in Government Agencies *continued*

200303268: Diane Matthews	7	The concept of sustainability would need to be seen as a common purpose so that a 'whole of government' approach would be the basic guiding philosophy. The proposed new Biodiversity Conservation Act, when ratified, will need to be taken into consideration here. The State Weed Plan needs to be included and implemented as part of this Sustainability Code of Practice and Action Plan.	Noted.
200303074: Department of Conservation and Land Management	4, par 3	It is suggested that a model or example of a Sustainability Action Plan required by agencies be provided, so that agencies have an indication of what is involved in carrying out this task, and the resources required.	Agreed.
200303348: Conservation Council of WA	5, par 1	There is a need to make department heads responsible for the implementation of sustainability programs within their agencies or they will not be a priority. Sustainability needs to be written into performance agreements and implementation targets need to be set.	Noted.
200303048: Conservation Commission of WA	1, pg. 8	In relation to the proposed Sustainability Code of Practice, and Sustainability Action Plans, the Commission suggests the inclusion of a new proposed action for the Final Strategy that would read: <i>The Department of the Premier and Cabinet will require each and every Government agency to present its first Sustainability Action Plan at the end of the 2003/2004 fiscal year. The presence and quality of these Annual Plans will be audited by the Auditor-General. The Commission suggests that this level of commitment is required for each recommendation made in the Final Sustainability Strategy.</i>	Noted.
	1, pg. 9	The Commission believes that the Final Sustainability Strategy should recommend the drafting of a Sustainability Administration Act, to enshrine the most important proposed actions. This should be a brief 'framework law, which would leave implementation details to future regulation. The Commission recommends that the Final Sustainability Strategy include an outline for this proposed new legislation.	This is supported in the final Strategy.
200303443: State Development Portfolio	40	It is suggested that the dot point reference to community engagement plan (Box 9) could be enhanced by additional reference to the purpose of such plans (e.g. to seek the views of important stakeholders on significant issues relating to the operations of each agency).	Noted.
	41	It is suggested that it may be appropriate to include a recommendation for the Department of the Premier and Cabinet (Citizens and Civics Unit) to provide training to agencies on the principles in the Consulting Citizens Resource Guide.	Noted.
200302774: Waste Management Association	p.10	We generally agree with the waste management related aspects of this section. However, requirements relating to waste management under the proposed "Sustainability Code of Practice and Action Plan" should be for sustainable waste management, which includes sustainable recycling.	Noted.

Embracing Sustainability in Government Agencies *continued*

200302948: Environmental Defenders Office	Page 3 and 4	<p>To incorporate sustainability within Government, each Government agency needs to:</p> <ul style="list-style-type: none"> • develop, with public input, its mission statement to include a commitment to sustainability; • amend its corporate and business plans to incorporate the concept of sustainability and its implementation; • commit to fully engaging the community in sustainability issues; • prepare a sustainability assessment and action plan reporting on sustainability issues including key sustainability performance indicators for ongoing reporting; • provide independent audit reports against any sustainability plans, using a public reporting system and employing targets and milestones; • improve understanding of the concept of sustainability at all levels within each agency; • prepare and implement purchasing policies to reflect sustainability principles; and • introduce annual environmental performance reporting requirements and mandated targets in areas such as energy consumption, waste disposal, vehicle fuel efficiency and recycling. 	Many of these suggestions will be addressed through the Sustainability Code of Practice for Government Agencies.
200302729: Shire of Serpentine- Jarrahdale	6, pg. 5	The Code when developed needs to have local government involved in the preparation but also made aware of its availability, function and the state government support available to help implement it. Serpentine Jarrahdale in regards to progressive sustainability initiatives has in the past been restrained by State Government and in moving towards integration of sustainability at a State government level it must be ensured that the role of state government is to support progressive actions on sustainability especially as local government moves at faster pace due to their flexibility. All proposed actions for state agencies should also apply to corporatised agencies.	Agreed.
	1, pg. 6	Objective: Government must lead by example and be transparent in its actions. The action plans should be available for general viewing which will provide an invaluable educational resource.	Noted.
	2, pg. 6	<i>Indicators and Targets</i> Number of local government who have a sustainability action plan	All indicators and targets have been removed from the final Strategy.
200303143: Royal Automobile Club of WA	Pg. 13	Generally agree however, would suggest that industry and stakeholders be included in item 1.6 as they will be affected by Government decisions that result from the Sustainability Code of practice.	This is reflected in the final Strategy.

Embracing Sustainability in Government Agencies *continued*

200303590: WA Collaboration	4, pg. 4	1.5 As outlined in the Community Sustainability Agenda, the WA Collaboration would like to see an immediate review of all relevant legislation. Sustainability should be given the same priority as was competition in the legislative review undertaken for the National Competition Policy process.	Noted.
	5, pg. 4	1.6 & 1.7 The Codes of Practice and Action Plan's for Government agencies are a positive step, but as currently outlined in the draft Strategy are very focused on environmental management. More consultation with relevant Government departments and groups such as the WA Collaboration and WACOSS, should be undertaken to ensure that aspects of social sustainability are being incorporated.	Noted. Consultation on the Sustainability Code of Practice for Government Agencies is addressed in the final Strategy.
	Rec. 13	Fund environmental management agencies and programs The level of funding currently provided to State Government environmental agencies is inadequate to meet their legislative responsibilities and to implement their wide range of environmentally related strategies, policies and programs. This has major impacts on public health, on lower socio-economic groups and on environmental degradation. The State Government should substantially increase state budget allocations to State Government environmental agencies, in order to reverse the decline in funding to these agencies, and allow them to fulfil their legislative responsibilities.	Noted.
200300358: F. Schnattler	Sec. 3.2, pg. 3	Add to Draft Goal 1.7 the following: <ul style="list-style-type: none"> ❑ Build a water-harvesting fleet of remote-controlled Zeppelins that harvest rain water over the continent or preferably out in the ocean and dump the harvested rainwater into the dams, or at locations where it is needed. ❑ Build non-polluting energy-producing infrastructure, eg. GEM = Gravity Energy Machines, ... ❑ Comprehensively initiate Bioprospecting Programs that also include human cloning and human genetic research 	Outside the scope of this Strategy.
	Sec. 3.3, pg. 1	The today's need for such an action reveals the organisational weaknesses of the present governmental concepts and systems. The Partnerships for Action program must allow for engaging and BEvolutionary public input in a transparent manner.	Noted.
	Sec. 3.3, pg. 2	Modify as shown below: ... Involve the WA Collaboration in the roundtables as well as other community groups, industry and research interests.	This is addressed in the final Strategy.
	Sec. 3.3, pg. 3	Work with community and industry stakeholders to implement the State BEvolution Strategy through partnership concepts and systems progressively.	Noted.
	Sec. 3.3, pg. 4	As part of the Community-State-Local Government Roundtables examine of how BEvolutionary assessment can create concepts and systems for task sharing and processes in projects of regional and state-wide importance.	Noted.

Partnerships for Action

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	15	The proposed establishment of a partnership with Local Government (through the Western Australian Local Government Association (WALGA) is aimed at creating a State-Local Government Common Sustainability Framework consisting of common principles, goals, approaches and programs for sustainability (Action 1.8). Further support to the already established State-Local Government Sustainability Roundtable (Action 1.9) will explore the role of Regional Councils in supporting sustainability and the implementation of sustainability at the Local Government. Officers of the EMRC have been involved in the roundtable and propose to play a leadership role in future roundtable forums.	Noted.
	16	Working with other stakeholders to achieve sustainability outcomes (Action 1.10), particularly to improve Local Governments involvement in large development projects (Action 1.11), are supported and will require further negotiation with Local Governments to determine suitable arrangements and resource requirements.	Noted.
200219175: City of Armadale	2	Proposed Action 1.8 is supported.	Noted.
	4	Proposed Action 1.9 is supported subject to true consultation on regionalisation.	Noted.
	6	Proposed action 1.11 is supported.	Noted.
200303160: Goldfields Esperance Development Commission	Page 5	A positive initiative. Many regions have their own highly developed portals. A high percentage of people in our region have access to the internet. This could also be used in the education process in schools,	Noted.
200300305: The Institution of Engineers, Australia.	31	In the discussion of Regional Councils, there are existing examples of the successful use of this model in New Zealand, which appear to have not been considered in the Strategy. These councils are much more comprehensive in scope and application than the WA Waste Councils and should be considered as a working model for emulation.	Noted.
200303268: Diane Matthews	9	For this action to produce the required outcome it would be necessary for local community environment and landcare groups to be represented within this Partnership. These groups contain a very large proportion of the skills, knowledge and ability within West. Aust. to manage our local and regional reserves that protect the quality of our air, soils and water.	Noted.

Partnerships for Action *continued*

200219280: City of Swan	18	There is a focus on the establishment of regional councils to deliver Regional Sustainability Plans and 'Sense of Place' documents. Although in principle this is supported, the practical implementation issues in relation to regional councils need to be considered. This includes, the significant differences in rate base and resources between regional local authorities, the perception as another 'layer' of local government and the difficulties in coordinating priorities of various local authorities. A regional arrangement coordinated by and between local authorities to address a specific purpose (such as a Regional Sustainability Strategy) would be less resource consumptive and more flexible than a permanent, long-term body. Many Regional Council's have been developed on the basis of waste management, this is not necessarily the common theme or sophisticated grouping required for regional councils.	This is supported in the final Strategy.
200300887: Australian Corporate Citizenship Alliance	18	While endorsing this approach, there is also the opportunity to encourage partnerships at the local level particularly between business and local government. If business is to be responsible for economic, environmental and social bottom lines, their local impact is a good starting point.	Noted.
	20	Partnering at this level can provide tangible benefits within relatively short time frames and provide a stepping-stone to involvement in broad long-term strategies to achieve sustainability outcomes.	Noted.
200219280: City of Swan	19	The role and process for a State-Local Roundtable should focus on equal partnership. The recent plethora of state strategies and new legislation emphasise the 'partnership' with local government, which can be interpreted to mean devolution of responsibility. This issue needs to be holistically identified across the state agencies and addressed. Local governments are experiencing increasingly sophisticated service demands from the community and is not in a place to also extensively resource a number of strategic initiatives from state agencies, who are best placed to resource and implement these recommendations.	Agreed.
200300368: City of Kalgoorlie- Boulder	4	State and local government having common principles, goals, approaches and programs is seen as positive as the local government is pivotal in implementing the State Sustainability Strategy. The Local Government Sustainability Roundtable is also seen as positive, the WAGLRUF, formed by the City's Mayor, is regionally based and has seen many issues identified and resolved for the benefit of the whole region. The involvement of local government in larger development projects would be seen as very positive as the current lack of notification of large development projects to the local government needs to be addressed.	Noted.

Partnerships for Action *continued*

200300357: Water Corporation	33	This section places the importance upon the establishment of regional councils to manage natural resources similar to the regional council model, which was structured for waste "rubbish" management. There is a fundamental difference between waste management and natural resource management as waste can be measured in terms of volume and type. Not so for natural resources as evidenced with the management of unwanted water "drainage". Perhaps a model, which could be considered, is regional cooperation between councils within a particular catchment and partnerships with relevant state organisations (similar to the WESTROC model). In the case of natural resource management, the success of this model or any other will be determined by the clarity of accountabilities and responsibilities, in other words the governance framework in place.	Noted.
	34	Regional councils are accountable to their membership (member councils) rather than the communities, which means that the community has little or no contact with the regional council. Another issue facing regional councils is determining the service cost and distributing them to member councils, for example are costs distributed on population, commercial activity, and number of properties or area.	Noted.
200302235: Shire of Denmark	5	If local government is to be expected to embrace the Strategy, then resources should be considered to ensure its success. All too often Council's are asked to implement State initiatives, but without resources from the State.	Noted.
200302856: City of Stirling	8	The City supports the concept of a State-Local Government Sustainability Roundtable to develop a common sustainability framework (p 51). This process will facilitate an ongoing partnership between state and local governments to address issues surrounding sustainability. The success of this partnership may well encourage industry groups and community groups to form similar partnerships at the local level. The Roundtable provides the opportunity for information sharing between State and Local Government to maximise efficiency and to assist local authorities with the implementation of best practice examples of sustainability processes. <i>Subject to reaching an agreement on the underlying principles, this action could be supported.</i>	Noted.
200311216: Zoe Moore	18	In short..Objectives. These interests currently work against civil society and so any resultant and final State Sustainability Strategy will certainly be biased toward goals of industry with the usual support of local government and the conflicted impartiality of commissioned research organisations.	Noted.
200302814: GeoCatch	3	It is felt however, that greater recognition and support of integrated catchment groups, should be included in the Strategy either in section sustainability Use of Natural Recourses or Partnership for Action.	This is addressed in the final Strategy.

Partnerships for Action *continued*

200302959: City of Fremantle	11	... the proposed actions to progress partnerships amongst local government refers to the Western Australian Local Government Association (WALGA) with no mention of the Department of Local Government and Regional Development. This State Government department should take a greater role in leading local governments towards sustainability with the support of WALGA. .	Noted.
200302855: Planning Institute of Australia	33	The creation of additional regional councils is questionable as it effectively provides another tier of administration and uses increasingly scarce resources. It is recommended that the effectiveness of such regional councils be examined with particular regard to their implementation of sustainable outcomes before actively pursuing the creation of any more. Many local governments achieve such outcomes through working cooperatively and more informally without having to attend and service administrative structures.	Noted.
200302850: City of Mandurah	30	The WALGA submission emphasised the need for an integrated approach – including: <ul style="list-style-type: none"> • Aligning the State Strategy with those already existing in local governments. • Ensuring the State Strategy extends to the reach of Local Governments' current strategies, and value-adds in these areas. • Ensuring common approaches are taken. Prioritising the opportunities for regionally based actions, which benefits the State and Local Governments.	Noted.
200303065: City of Gosnells	15	The Perth Economic Development Forum is a group of local government and economic development professionals that meets to address common issues that affect the Perth metropolitan area. Whilst this is not a formal group it does represent a link between local government and the general business community. It is considered that this group's input into the Strategy would be useful.	Noted.
	16	It is also considered that many opportunities exist for the state government to increase its role as a facilitator of partnerships. Government has a key role in identifying potential relationships between organisations and facilitating linkages with appropriate agreements.	Agreed.
	18	Whilst it is recognised that regional partnerships can provide efficient frameworks within which to develop and implement sustainability strategies, the development of regional councils for this purpose must be more fully explored and approached with caution. It should be noted that much of the legislation enabling local governments to influence sustainability outcomes lies outside the Local Government Act (e.g. the Town Planning and Development Act), as such it would be critical for the roles of regional councils to be clearly defined and limited to prevent duplication of services and the creation of an inadvertent fourth tier of government.	Noted. The emphasis in the final Strategy is placed on further considering the possible roles of Regional Councils of Local Government. See <i>Partnerships for action</i> .

Partnerships for Action *continued*

200301547: City of Cockburn	8	While the State – Local Government Roundtable on Sustainability is supported by the City of Cockburn, there is some concern about the level of Local Government representation on the Roundtable. It is envisaged that representation should include both elected Members and Council officers to assist with providing detail about the internal processes of Local Government to ensure any framework and implementation processes are consistent and complimentary with existing processes.	Noted.
200217800: Michael Bell	11	Government should commit its fleet vehicles to be totally, gas or electric powered. (Gas powered vehicles have been made for about 100 years)	Noted. The final Strategy includes reference to a revised vehicle fleet policy. See <i>Embracing sustainability in government agencies</i> .
	12	The present system where a local government can be completely ignored, kept in the dark and left out of environmental decisions in their area is a disgrace!	Noted.
200303161: William (Bill) Grace	14	The key to success of the Roundtable will be ensuring that both the state government, and local governments, see it as the focal point of the sustainability agenda. This will depend on: <ul style="list-style-type: none"> • The resources available to the Roundtable to properly research issues and develop comprehensive Action Plans The commitment of the State Government to drive the agenda of the Roundtable through the various state agencies.	Noted.
	23	The relationship of business with the Strategy needs to be clarified in the final Strategy. In the Partnership section in Governance there is no mention of business (save for a reference to industry stakeholders in Rec 1.10).	Noted.
200303088: Australian Association of Planning Consultants	5, par 5	This proposal is supported, however it should also include representatives from the development industry and professional associations, such as the AAPC, on specific issues such as Sustainability Assessment, Statements of Planning Policy, the proposed Planning, Building and Construction Guide.	Noted.
	5, par 6	Western Australia has a showcase of exemplary work undertaken by professional planners and urban designers in the private sector that have achieved national and international award winning status.	Noted.
	6, par 1	It is clear that planning processes will be a central and crucial instrument in implementing sustainability measures. The involvement and contribution of planners in developing the Strategy is fundamental to its successful implementation.	Noted.

Partnerships for Action *continued*

200303092: Housing Industry Association	1-3, p.9	<p>The focus on this part of the draft report is on State - Local Government partnership. However, HIA recommends a broader approach through the engagement of industry in the proposed state-local Partnership (and the transitional roundtable) is recommended.</p> <p>HIA...formally requests inclusion in the Partnership in those areas relevant to its roles in the housing sector.</p> <p>HIA recommends that the use of the word 'industry' is clarified as including <u>all industry (bodies) from all sectors of the economy</u>. For example, the land development, building and construction industry associations are not mentioned in the Chapter despite the importance of these sectors to social fabric and economic prospects of the State.</p>	Noted.
		<p>It is recommended that partnerships of state and local government, industry, community and academic interests are established for each sector of the economy. The terms of reference of such partnerships should be defined by all involved. This would be a more efficient, targeted and effective approach towards sustainability that the broad ones suggested.</p> <p>HIA recommends that the WASIG group be given the responsibility to establish and operate these partnerships so that accountable, objective policy and auditing functions are established for government by a collective of industry, community and government.</p> <p>HIA recommends far greater recognition be given to the integrating role of the state's planning agency. The report does not give sufficient weight to the role played (or possible for the future) of planning.</p> <p>HIA recommends that the Premier, through the State Sustainability Strategy, elevate the status of the Minister for Planning and Infrastructure and her agencies within government (Cabinet, budget allocation, primacy of legislation) as a cornerstone for the achievement of sustainability outcomes for Western Australia.</p> <p>While charged with a major role, the portfolio is poorly resourced. A higher profile is needed in the community and government of the role played by planning.</p> <p>An example of the need to better resource and utilise the planning portfolio is in the lack of government focus on WALIS. The role of WALIS is acknowledged in the draft report but the final report should propose a larger more urgent role for WALIS.</p>	<p>Noted. Partnerships for a range of sectors, including building and construction, are proposed to operate within the Sustainability Roundtable.</p> <p>WASIG is mentioned specifically is being involved with partnership processes for the development of factor 4 programs.</p> <p>The Strategy gives greater attention to the role of planning system, including WAPC in supporting sustainability.</p>

Partnerships for Action *continued*

200303092: HIA		The proposal (pp 55, 56) that a larger role should be played through the use of State Planning Policies is supported by HIA. The use of more SPP's would encourage a more consistent policy and process approach while allowing place-based solutions to planning matters and a 'sense of place' for local communities. However, A significant impediment to this proposal is the mechanism for including Statements of Planning Policies (SPP's) into Local Government Town Planning Scheme's (TPS's). SPP's are only introduced into TPS's when schemes are being reviewed. The Town Planning Scheme review process is protracted, costly and cumbersome with the result that it can take years for SPP's to be included in TPS's and have the force of law in those areas. HIA recommends that the legislation be amended to fast track the inclusion of SPP's into local government Town Planning Schemes.	Noted.
200303073: Natural Resource Management Council	Point 2	The Strategy talks about what State Government and Government agencies will do, but does not widely address the role of other groups and organisations such as non-government organisations, (NGOs) community groups, etc. The Natural Resource Management Council is not mentioned and the Regional NRM Groups are not named fully, but are described as "the five natural resource management regional organisations". You would be aware that an interim rangelands group (The Rangelands NRM Coordinating Group) has been established and is incorporated. Possibly a map showing the regions would be useful. Additionally, NGO's like the World Wide Fund for Nature (WWF), Greening Australia and Conservation Council are active and should be acknowledged. The document needs to engage a wider group of stakeholders in order for it to have any effect, and these should be explicitly mentioned.	This has been addressed in the final Strategy.
200303443: State Development Portfolio	42	This section of the Strategy document (p.51) places significant emphasis on the development of partnership arrangements between State and Local Government. Whilst these actions are supported there is also scope for a range of other partnerships to be developed (e.g. consultation with natural resource management bodies, community groups, Chambers of Commerce). Accordingly, it is considered appropriate that this section of the report be modified, to reduce the emphasis on the role of the Local Government Association (and affiliated bodies) in sustainability.	Noted.
	43	This section could also explore the role of Non Government Organisations (NGOs) within the process, as they may be of assistance in promoting the cost effective implementation of the requirements of the Strategy. These organisations will have a role to play in any strategic alliances formed with local government and other groups. Consideration regarding the resourcing requirements for these partnerships should also form part of the implementation processes for the Strategy.	Noted.

Partnerships for Action *continued*

200303443: State Development Portfolio	44	There is concern at the significant focus given to the Town Planning and Development Act being used as a tool for enabling sustainability principles and processes to be incorporated into statutory processes at the local level. ...Accordingly, the focus of the Strategy in handling these issues needs to be broader than simply establishing a partnership between State and Local Government. Rather, for each category of issues an audit should be conducted to establish what programs, networks and forums are in place to address these matters and how these could handle sustainability matters in different areas or regions.	Noted.
	45	It is also suggested that Recommended Action 1.11 be modified to allow the State-Local Government Roundtable to develop strategies for improved involvement and consultation with local governments in large development projects, rather than restricting these considerations to the assessment process.	This is addressed in the final Strategy through the development of a protocol for communication and coordination between Local Government and the Department of Industry and Resources.
200303073: Natural Resource Management Council	Point 11	Regional NRM groups have developed over recent years, and now there are six NRM community based groups covering the State and working towards developing NRM strategies. The groups are at varying levels of maturity and the strategies at various levels of development. Council believes the continued impact of these groups needs to be acknowledged and focused in the Sustainability Strategy, and they need to be engaged in developing and implementing the Strategy.	This is addressed in the final Strategy.
	Point 14	The Strategy needs to acknowledge a relationship with NRM Council. Council has been charged by the Government to provide leadership in NRM and to give strategic policy advice to Ministers. Council sees that it is involved in the sustainability area, and is planning to develop a NRM vision and strategy. Government also asked Council to develop a vision in its Government Response to the Salinity Taskforce report. Council believes some mention of the NRM framework, the NRM Council and key NRM players needs to be mentioned, and some idea of roles and linkages given.	This is addressed in the final Strategy.
200304006: City of Perth	5	The City is also concerned that there has not been a comprehensive evaluation of the economic synergies between the CBD and the greater Metropolitan Perth or the economic relationship between Perth and the regions.	Agreed. Beyond scope of State Sustainability Strategy though there is an emphasis on centers.

Partnerships for Action *continued*

200304006: City of Perth	5	The City is also concerned that there has not been a comprehensive evaluation of the economic synergies between the CBD and the greater Metropolitan Perth or the economic relationship between Perth and the regions.	Agreed. Beyond scope of State Sustainability Strategy though there is an emphasis on centers.
200302729: Shire of Serpentine- Jarrahdale	4, pg. 6	<i>Objectives</i> Another objective should be to establish a long term ongoing partnership between state and local government.	Noted.
	5, pg. 6	<i>Proposed Actions</i> There needs to be resources committed to establishing partnerships that have a long term focus.	Noted.
	6, pg. 6	<i>Indicators and Targets</i> *Number of local governments using the framework established through the Partnerships *The number of local governments and state government agencies contributing to the partnership	All indicators and targets have been removed from the final Strategy.

Planning for Sustainability

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	17	Working with Local Government, industry and community (through the State-Local Government Sustainable Roundtable), it is proposed to investigate the application of statutory planning processes to support sustainability outcomes (Action 1.12) and to facilitate increased involvement of Local Government in natural resource management (Action 1.13). Statements of Planning Policy (SPPs) have been identified as a method to give legal effect to sustainable planning controls and to guide actions for State Government and Local Governments. As an active member of the roundtable, officers of the EMRC will provide input into planning and natural resource management proposals to ensure that they are practical and effective at the Local Government level.	Noted.
	18	The formation of a Strategic Alliance with the Department of Planning and Infrastructure (Action 1.14) and conducting a Planning for Sustainability Forum (Action 1.15) are key State Government actions identified to assist in reforming the planning process to incorporate sustainability.	Noted.
200219416: City of Belmont	15 & 16	The City of Belmont is supportive of the State Sustainability Strategy but is of the view that if implementation is to be achievable issues of: <ul style="list-style-type: none"> • Funding • Technical and educational resources • Priorities • Responsibilities, and • Institutional Change will have to be seriously addressed by the state in close collaboration with local government, the private sector and the community.	Noted.
200219175: City of Armadale	8	Regarding Proposed Action 1.12, note concern that Statements of Planning Policy need to be carefully drafted and not generally used to implement land management objectives.	Noted.
	10	Strategic planning for natural resources should remain with the State government.	Noted.

Planning for Sustainability *continued*

200219175: City of Armadale	11	Natural resource management planning uses different boundaries for different aspects of natural resource management, and strategic planning often needs to rely on specialised expertise not held by local government administrations. For example, biodiversity conservation through retention of remnant vegetation (i.e. bushland) uses the Interim Biogeographic Regionalisation for Australia (IBRA) framework along with assessment of the bushland by a botanist to determine conservation significance of remnant vegetation. In contrast, regional drainage assessments should be based on catchment boundaries. It is unlikely that IBRA and catchment boundaries match. Furthermore, it is even less likely that local government administrative boundaries and the different natural resource management boundaries match. Creating regional councils for each issue is not considered realistic or appropriate.	Noted. The final Strategy emphasises the need to consider the appropriate role of Regional Councils in supporting sustainability together with individual local governments and the State Government supporting local government. See <i>Partnerships for action</i> .
	12	Whilst statutory planning processes could be improved to explicitly identify areas that have conservation value rather than identifying them just as Parks and Recreation reservations, there is little more that statutory planning processes and EPP's can do to protect remnant vegetation. Clearing is proposed to be controlled through amendments to the Environmental Protection Act, and once this is in place the major threats to biodiversity will be issues that are probably not within the ambit of statutory planning. For example weeds and dieback are major threats, but is questionable whether planning controls are an appropriate way to prevent people living next to conservation areas from planting plants that will become weeds or that may carry dieback in the soil.	Noted.
	13	Recommendation 1.13 is not supported	Noted.
200219280: City of Swan	22	Town Planning Schemes are an important mechanism for addressing sustainability issues in the statutory processes. Although there are a number of LGA's who have embraced the LA21 program, the difficulty in incorporating this into scheme mechanisms becomes apparent when looking at the limited legislative opportunities supporting sustainability, and the 'on-ground' resourcing the application of the outcomes of these principles. Statements of Planning Policies are useful documents, but sustainability objectives must be included in guiding legislation such as the TP&D Act, and in the State Planning Strategy. Additionally these principles must be strongly supported by state agencies responsible when assessing proposals and setting conditions.	Noted.
	23	Statements of Planning Policy are still traditionally 'siloe'd' into the sectors as identified in Figure 3. Objectives within SPP's within sectors will need to reflect sustainability principles.	Noted

Planning for Sustainability *continued*

200219280: City of Swan	24	Although a recognised as a key mechanism, it must be remembered the TP&D Act is primarily a public health and land use piece of legislation, it may not be within its capacity / contradictory to also address sustainability principles, new legislation or holistic legislation may be required.	Noted. The final Strategy emphasise a range of mechanisms to support sustainability.
	25	The report will need to identify deficiencies in existing legislation and identify the extent to which legislation requires amendment to achieve the triple bottom line. In other words legislation needs to be examined holistically, and amended holistically to achieve integration. A piecemeal approach that focuses only on one piece of legislation such as the <i>Town Planning and Development Act 1928 as amended</i> will not suffice.	Noted.
	26	Perhaps a role of the Sustainability Policy Unit is to examine various reports and statements of planning policy (see page 55 of the report) including legislation with a view to identifying the extent to which the criteria for sustainability assessment of projects, plans, policies and programs are being achieved. (See page 37). This perhaps is where the careful selection and use of indicators and targets may be used to assess and validate the extent to which planning processes contribute to sustainability.	Noted.
	27	The draft Strategy has increased assessment requirements for Planning and Building sections to achieve sustainability outcomes – this will need State Government to review mandatory assessment periods and support environmental conditions placed upon developments. All developments should be assessed against a standard rating system (e.g. NABERS) and should comply with a certain star rating level - enforced by the WAPC.	Noted.
	28	The proposed integrated, regional and more formalised (SPPs) planning approaches are worthwhile, but high levels of integrated co-operation and co-ordination (including responsibility, management and resourcing issues), will largely determine the success or otherwise of proposed objectives and actions.	Noted.
	29	An example of an attempt to address the issues of formal structure of responsibilities and management is the Queensland Integrated Planning Act and the attendant administrative / management mechanisms.	Noted.
200300305: Institution of Engineers, Australia.	24	Local Government should be involved in assisting the State Government in implementation of the Strategy as they are at the 'grass roots' level of dealing with local issues. However, care should be exercised in delegating the implementation so that Local Government is not lumped with significant responsibility and activities without sufficient resources and finances to implement them.	Noted.
	22	The 'Strategic Alliance for Sustainability' is mentioned in this action item. However, this term was not observed or defined in the discussion leading up to the statement within the action and therefore would need to be elaborated on.	A Sustainability Directorate has been established within the Department for Planning and Infrastructure.

Planning for Sustainability *continued*

200300305: Institution of Engineers, Australia.	32	Because planning will be the key mechanism for ensuring sustainability in the State development, Institution agrees that the DPI should have a key role to play in implementing the Strategy from a planning viewpoint.	Noted.
	33	In addition, the Statement of Planning Policy appears to be a readily available and useful policy mechanism to embed sustainable consideration with the planning framework. However, the usefulness of this tool is not fully realised due to its advisory nature. To gain fuller benefits Statement of Planning Policies should be codified in statutory schemes and regulations so they have more than just an advisory status.	Noted.
	34	The potential marketability of professionals, both planning and other, will be enhanced by the successful application of sustainable development framework and models in WA. This will benefit all the professionals involved. The prominent role of engineers in guiding and giving practical effect to sustainability outcomes needs greater acknowledgment.	Noted.
200300368: City of Kalgoorlie- Boulder	5	The implementation of sustainability planning by local government is already occurring to some degree but it is agreed that there can be more stringent requirements introduced for more effectively support sustainability planning. It is noted that the responsibility for implementing the sustainability principles and guidelines will lie with the local government through the assessment and development approval process. Therefore the need for legislative powers to enforce these requirements is strongly advocated such as modified penalties, which give the ability to issue fines to ensure compliance or penalties for enforcement matters. The proposed Strategic Alliance for Sustainability within the DPI should have local government representation.	Noted. A Sustainability Directorate has been established within the Department for Planning and Infrastructure.
200216233: Ian MacRae	10	Scheme and the sentence on page 55 could read, "Local Town Planning Schemes are an important mechanism for addressing sustainability issues in the statutory process as well as the Metropolitan Region Scheme and Country Region Schemes and Regional Plans".	Noted.
	11	It should be noted, on the penultimate paragraph of page 55, that some of the Statements of Planning Policy quoted have as yet not been finalised or even prepared, so that are not actually "current".	Noted.
	12	It may facilitate the achievement of the vision for regional areas, discussed on page 56, to utilise the work undertaken in conjunction with regional development commissions in the late 1990's in respect of the State Planning Strategy. This Strategy provided a vision for each region, which was the subject of considerable consultation and discussion and could be a starting point at least for further refinement.	Noted. The final Strategy emphasises the important role of the Western Australian Planning Commission in supporting the development of Regional Sustainability Strategies.

Planning for Sustainability *continued*

200216233: Ian MacRae	13	It is stated (on page 57) that some regional councils of local government have demonstrated regional sustainability planning. Whilst this is asserted, it may be that little has actually been demonstrated other than the writing of reports and the desire to be involved. It is unclear whether regional councils are to be given statutory powers, presumably at the expense of local government, to enable them to implement the Statements of Planning Policy, or whether they will be advisory only.	Noted.
	14	There is a risk of over-selling the use of Statements of Planning Policy. It should be recognised that such policies need to be soundly based and it would be difficult to achieve anything of substance if they were not related to providing guidance to authorities on how to make decisions where development is contemplated. Such policies which aim to make things happen would probably be ineffective however unassailable the rhetoric may be.	Noted. The final Strategy emphasises the role of a number of strategic and statutory planning mechanisms, and is not constrained to Statements of Planning Policy.
	15	One approach that has not been grasped is that through the preparation of town planning schemes, particularly through the preparation of local planning strategies, considerations relating to sustainable development could be better debated and policies to be included in schemes justified.	This has been addressed in the final Strategy.
200219471: Town of Cambridge	23	At a local level, the strategy promotes regional organisations of Councils as perhaps the best way of delivering sustainable planning outcomes. Further, Town Planning Schemes are identified as a primary instrument for the implementation of sustainability goals. Whilst acknowledging that regional organisations of Councils have had some considerable success with matters such as waste disposal and environmental management, the idea of extending such an operation to Town Planning Schemes has practical difficulties, from a legal point of view as well as social and political. Further, it is considered that the ability of the Town Planning Scheme to deliver some of the broader sustainability proposals (environmental, economic and social) is overestimated.	Noted.
	25	If the intention is to amend the Town Planning and Development Act to require a Town Planning Scheme to incorporate much more, then its preparation will become infinitely more complex. Local governments are already struggling to maintain their existing schemes. Of the 153 Town Planning Schemes in WA, only 30% are current i.e. less than 5 years old. Nearly half are more than 10 years old. In the circumstances, the broadening of the function of the Town Planning Schemes could prove to be counter-productive. This is not to say, however, that schemes must not be complementary towards advancing the sustainability cause.	Noted.

Planning for Sustainability *continued*

200302856: City of Stirling	10	The City acknowledges the opportunities that exist for Town Planning Schemes to incorporate sustainability and natural resource management principles and processes. It would be desirable for the legislation (or subservient policy and regulations such as the Model Scheme Text) to be amended to provide a stronger mandate for the inclusion of sustainability considerations into Town Planning Schemes. These Scheme provisions could include a range of natural resource management and sustainability issues such as urban stormwater management, soil conservation, vegetation clearance, passive solar design and water sensitive design. However, this step should only be taken after careful consideration of all the relevant factors and adequate public consultation, as other jurisdictions have had difficulties in implementing similar legislation due to its perceived abrogation of private property rights. An example of this is the introduction of the <i>Resource Management Act</i> by the New Zealand Government in 1991.	Noted. See reference in the final Strategy to the proposals to amendments to planning legislation to consolidate provisions and integrate sustainability.
	11	The state/local government roundtable will identify opportunities through planning processes and procedures to implement the State Sustainability Strategy (p 55). This process may provide the appropriate forum for the resolution of the issues mentioned above.	Noted.
200311216: Zoe Moore	19	EMRC quote- misleading, the EMRC promote mass urban development such as that planned for the Eastern Corridor.	Noted.
200302856: City of Stirling	12	The Strategy fails to acknowledge that the Local Government Act could be amended to require the incorporation of sustainability principles into Council's Strategic, Corporate and Business Plans (as has occurred with community consultation). The Local Government Act also provides the opportunity for the inclusion of triple bottom line reporting into local government operations. It is acknowledged that the thinking is not to legislate for the inclusion of sustainability principles, but to give local government the opportunity to work collaboratively to introduce these principles on a voluntary basis. Perhaps amendments to the Local Government Act could be listed as a possible future action. <i>Subject to the changes suggested above, this action is generally supported.</i>	Noted.
200303065: City of Gosnells	19	The Western Australian Planning Commission has many of the tools required for implementation of the Strategy at a policy level, and duplication should be avoided (ie change existing policies to be consistent rather than developing new tools), however this can only be effective with changes in approach with other agencies (particularly the Department of Environmental Protection) to allow appropriate application of the policy position.	Noted.
	20	The state government must consider introducing statutory provisions for the linking of transport, services, commerce and residential development along sustainable lines.	Noted.

Planning for Sustainability *continued*

200303065: City of Gosnells	22	It must also be recognised that development is not solely about statutory controls, and that the planning focus should be broadened to stimulate shifts in developer culture. The message that planned sustainable communities can, and do, sell must constantly be relayed to developers, as they are in many instances those most directly responsible for implementation of sustainability objectives.	Noted.
	23	Given the limited resources that most local governments have available to prepare strategic planning documents, the combination of planning and sustainability strategies would be far more favourable than a requirement for local governments to prepare separate sustainability strategies.	Noted.
	25	There is a need to consider possible processes for the assessment of the sustainability of major development proposals. There are currently no statutory requirements for local government to assess the sustainability of development and building applications....Development of an overarching planning framework in the format of a Statement of Planning policy would be beneficial. This should address general principles with requisite local policy providing specific operational detail relevant to the local context.	This is addressed through the Sustainability Scorecard proposal. See <i>Settlements</i> .
200305753: Department of Planning and Infrastructure	33	The DSSS proposed a key role for Statements of Planning Policy (SPP). DPI does not necessarily oppose the extended role for SPP. However DPI does not believe that SPP are in themselves a possible panacea. While they place an obligation on the planning system, the DSSS itself points out sustainability is very much about attitudes. It is quite possible that regulating may not of itself produce any change at all. It would be an extremely poor outcome if there were to be a proliferation of new SPP which just added to the administrative burden within the planning system with no discernible impact on sustainability outcomes.	Noted.
	34	The scope of the DSSS proposals goes beyond the scope of SPP which are currently envisaged by the WAPC. Given the legislative responsibilities of the WAPC this proposal needs to be the subject of full and careful consultation and discussion between WAPC and the SPU.	This is addressed in the final Strategy.
200300089: Phil Thompson	11	Page 55, quote by Royal Australian Planning Institute: reference to "... the direction and type of growth and development": 'development' is something which can be consistent with sustainability, 'growth' is not.	Noted.
200301473: North Lake Residents Association	16	As a society, we build museums to house artefacts for the community to view and admire, we pay for pieces of sculpture that we value as being beautiful, but rarely in our culture so we ask, 'How much is natural beauty worth?' 'Is biodiversity worthy of our admiration and stewardship?' 'When are we prepared to protect what made us, and makes us, uniquely human?'	Noted.

Planning for Sustainability *continued*

200301473: North Lake Residents Association	22 23	<p>Whether that is the case in the area of urban planning is questionable. Within the discourse of transport planning, the language used signifies cultural differences and the hegemony of the economic imperative. Environmental and social issues do not appear to be given core consideration, within a culture focused primarily on the economic dimension, at the expense of the natural environment.</p> <p>The need to change the culture of indifference to community and environmental values, is obvious in the language used. To talk of '<i>Minimising</i>' the social and environmental impacts from transport, portrays a completely indifferent cultural perspective. The assumption it makes is that it is possible to <i>minimise</i> environmental impact!</p>	
200300261: City of Albany	6	The Strategy identifies that the planning system has potential to have a major impact on sustainability. Western Australia has an established planning system, which is administered by agencies with considerable experience in dealing with a range of development issues (in addition to the public). The inclusion of sustainable principles in the planning system will provide a significant opportunity through both statutory and strategic processes to influence the type and direction of development. The Strategy should acknowledge this potential and should focus on modifying current controls in a manner that assists in reaching sustainable outcomes.	Noted.
	7	The Strategy outlines that Statements of Planning Policy and other strategic documents have a strong role to play in ensuring that issues relating to sustainability are considered in planning processes. It is suggested that modifying the Model Scheme Text to contain a range of sustainable provisions may create further gains. As new schemes are created they will be required to take into account standard sustainability provisions which will then be applied on a local level.	Noted.
	8	When developing sustainability criteria, and associated performance indicators, for the assessment of development it is important to ensure that the criteria enable the assessment of development from a balanced perspective. This is particularly important considering the focus of the existing system is on environmental protection and economic gain with little consideration being given to social implications.	Noted. This should be considered in the development of the Sustainability Scorecard.
200302160: Gold Esperance Development Commission	Page 5	The proposed Strategic Alliance for Sustainability within the DPI is sound and should comprise wide representation from all three tiers of government, and industry.	A Sustainability Directorate has been established in the Department for Planning and Infrastructure.

Planning for Sustainability *continued*

200303268: Diane Matthews	10	There is an over-emphasis here on the Department for Planning and Infrastructure. This proposal would be in conflict with the "Partnerships for Action" as proposed in 1.8 – 11. The Department of Planning and Infrastructure does not have the confidence of those experienced in environmental management in this state. If Sustainability is seen to be as 'meeting the needs of current and future generations through simultaneous environmental, social and economic improvement' this proposed action would form a major stumbling block to achieving sustainability.	Noted.
200303088: Austrian Association of Planning Consultants (AAPC)	6, par 2	There is also a need to acknowledge the role of urban design in achieving sustainability outcomes. Urban design is a major determinant of urban form in the land development process and has a major influence on the capacity to achieve sustainable outcomes in new and redeveloped urban areas. Urban design, as distinct from housing and lot layout design, should therefore be included as a discrete element in the proposed Planning, Building and Construction Guide. -Include planning professionals and land development practitioners in the process -Include Urban Design as and distinct and featured element of the proposed Planning, Building and Construction Guide	A new section has been included in the final Strategy. See <i>Sustainable urban design</i> .
	6, par 5	Allocate sufficient and appropriate resources for effective implementation of the Strategy	Noted.
200303425: Fire and Emergency Services Authority of WA	3, pg. 3	The consultation draft outlines a classification systems for Statements of Planning Policy (page 56). As weighty documents in the overall planning system, an SPP for natural hazard mitigation would carry significant influence. It would likely form a supplementary policy under the Sector Policy, " Sustainable Settlements and Community".	Noted.
200303092: Housing Industry Association (HIA)	2-5, p.10	Proposed Actions 1.12 to 1.15: HIA recommends that an additional Forum is held with all stakeholders to discuss mechanisms to 'build in' sustainability to planning practice. HIA is concerned that the draft report proposes to add another layer into an already complex system. Discussion with stakeholders and broad consultation on other options should be undertaken before committing to a single approach. It would be useful for the proposed State Local Government Roundtable to be segmented along economic sectors. As it is proposed, the scope of the Roundtable is far too general so much so that it could be highly ineffective. HIA recommends that a specific Roundtable is established focusing on the land development and housing sector. Proponents are a legitimate part of these sectors and should be party to issues that affect their performance.	Noted.

Planning for Sustainability *continued*

200303073: Natural Resource Management Council	Point 12	In a few years, it is envisaged that some integrating, over-arching form of NRM legislation will be developed. This legislation will link the existing Acts, and give some objectives for NRM. It will enable the creation or acknowledgment of community groups, and will give limited powers to enable groups and agencies to perform their NRM work effectively. This could be mentioned in the Strategy so open discussion can occur. It is also worth noting that the Agriculture Management Bill is being reactivated and work is starting on a Biodiversity Conservation Act. Both are key pieces of legislation in natural resource management, and acknowledgment of WA's stance on NRM and this legislation's link to NRM should be incorporated in the Bills.	Noted.
200302729: Shire of Serpentine- Jarrahdale	1, pg. 7	The role of local government will be crucial in planning for sustainability. Local government will need support and training to implement the processes required to achieve sustainability in planning. The framework and policies that are proposed to be achieved through the local and state government partnership need to ensure that tools and support for achieving this area of sustainability is achievable.	Agreed.
	3, pg. 7	Action 1.14: The DPI needs to go beyond having a strategic alliance to assist I the implementation of planning for sustainability they need to have dedicated staff and/or unit to deal with sustainability in planing in WA. This agency is the key agency driving the broad planning agenda and focus and a dedicated unit can provide direction and support in sustainable planning for both within the DPI and for local governments throughout the State.	A Sustainability Directorate has been established within the Department for Planning and Infrastructure.
	4, pg. 7	<i>Indicators and Targets</i> *Staff addressing sustainable planning in DPI as their focus *Integration of sustainability principles into DPI documents and policies	All indicators and targets have been removed from the final Strategy.
200303590: WA Collaboration	Rec. 4	Recommendation 4 Incorporate consideration of ethics In recognition of the importance of ethics in public policy and community decision-making, consideration of relevant ethical values and implications should be incorporated into all public policy consultation processes and policy documents.	Noted.
	Rec. 19	Sustainability-labelling of goods and services The State Government should establish accredited sustainability-labelling schemes for goods and services, with the involvement of community conservation, welfare and consumer groups and business.	This could be considered as part of the development of the Sustainability Procurement Policy.

Planning for Sustainability *continued*

200303590: WA Collaboration	Rec. 28	<p>Comprehensive legislative review</p> <p>The Department of Premier and Cabinet should undertake a comprehensive legislative review of all state legislation for consistency with sustainability principles and objectives.</p> <p>A precedent for such a comprehensive legislative review has been provided in Australia by the National Competition Policy legislative review process. Lessons of how and how not to undertake such a review can be learnt from that process.</p>	The final Strategy provides for the principles of sustainability to be incorporated into relevant legislation as it is reviewed or drafted.
	Rec. 30	<p>State budget reflects Sustainability Strategy</p> <p>The State Government should ensure coherence between state budgets and sustainability strategy priorities. "The Strategy needs to be fully integrated into the budget mechanism to ensure that plans have the financial resources to achieve their objectives, and do not only represent 'wish lists'. Conversely, the formulation of budgets must be informed by a clear identification of priorities". This will take many budget cycles to achieve and will need to be done incrementally.</p>	The final Strategy indicates that the work will be undertaken to ensure that the budget better reflects the triple bottom line and sustainability.
200303494: WA Planning Commission	3.12	The SPS already contains an emphasis on sustainability. The planning process of preparing town planning schemes and local planning strategies in particular, is an effective means of integrating future development, considering community views, regional and state issues and arriving at a balanced outcome. <i>It is questionable that the introduction of an additional layer of bureaucracy above this to specifically achieve sustainability will automatically lead to better outcomes without very careful consideration of the implications. Such an approach could be costly, and may be no more acceptable to the community who must be supportive if it is to succeed in its objectives.</i>	Noted.
	3.17	Whilst the identification of a process to be put in place to examine in more detail the key components of the framework, and implementation roles and processes in welcomed, the lack of reference to the role of the Commission is of great concern. Although the document throughout places great emphasis on the anticipated role of local government in the implementation process, it fails to acknowledge the key responsibilities of the Commission for implementing sustainability objectives based on the SPS using the State Planning Framework mechanisms. To date the Commission has not been asked to become involved in the Roundtable process. It is considered essential, given the declared importance of planning instruments, that the Commission is closely involved in discussions on how best to effect changes that can lead to more sustainable outcomes.	The final Strategy provides increased emphasis on the role of the Western Australian Planning Commission.

Planning for Sustainability *continued*

200303494: WA Planning Commission	3.22	In August 2002 a paper was provided to the SPU by the Department's Policy and Legislation Branch in response to these proposals identifying the legislative basis for SPP's, the role of the Commission, and the potential and shortcomings for the purposes indicated in the DSSS (Annex 2). <i>This reiterated that responsibility for the preparation of SPP's lies with the Commission. It proposed that careful consideration needed to be given to suggestions for additional SPP's, and to the appropriateness of SPP's as a tool for implementing the wide range of matters referred to in the DSSS.</i>	Noted.
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Sustainability in the Regions

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	19	Of the 249 actions contained in the State Sustainability Strategy, the proposed development of Regional Sustainability Strategies (Action 1.16) has the most significant resource and cost implications for the EMRC. The Regional Sustainability Strategy would need to include social, environmental and economic factors relevant to the region. If supported and developed, it is likely that an EMRC Regional Sustainability Strategy would be a joint project between Regional Development, Environmental Services and Waste Management/Engineering Services. The Regional Sustainability Strategy would consolidate the Regional Environmental Strategy, Regional Marketing Strategy, Resource Recovery Project, Regional Youth Strategy, Regional Tourism Strategy and other projects and activities related to sustainability.	Noted.
200219413: Shire of Capel	1	Council gave consideration to the consultation draft of the State Sustainability Strategy at it's meeting held on 11 December 2002 and resolved to advise you that it supports the importance given to the Government and the community working together to incorporate the concept of sustainability into all human activities. However it did note that many of the issues discussed in detail in the draft were treated in the context of the Perth Metropolitan Area. Council hopes that issues will be studied and addressed in Rural areas as much as in the Metropolitan context so that all communities are treated equitably.	Noted.
200219175: City of Armadale	15	Regarding Proposed Action 1.16, note concern that Statements of Planning Policy need to be carefully drafted and not generally used to implement land management objectives.	Noted.
200300261: City of Albany	2	The broad focus of the Strategy enables wide application but there needs to be the ability to cater for local conditions. It needs to be recognised that solutions that work within the Metropolitan area may not work in smaller settlements or rural areas. Disparities will occur between regions (and different local authorities within a region) on many issues and this needs to be recognised in the Strategy. The Strategy's success will be measured in part by its robustness, that is its application in the Metropolitan region and a small rural settlement needs to be equally successful.	Agreed.
200300307: Hamersley Iron	18	As a major employer in the Pilbara region, Hamersley endorses the inclusion of Sustainability in the Regions in the consultation draft and supports the development of Regional Sustainability Strategies. Hamersley suggests that the Regional Development Commissions have a logical role to play in supporting sustainability throughout the regions. Hamersley also suggests that there is a significant role for industry to play in the creation of Regional Sustainability Strategies; and that a focus on " <i>facilitating development and encouraging job creation in regions</i> " should be included in the list of points on page 59.	Noted.

Sustainability in the Regions *continued*

200219350: Leschenault Catchment Council Inc.	5	The development of Regional Sustainability Strategies cannot be adequately addressed when the document has a focus on the transfer of regional resources to sustain the Perth Metropolitan area. LCC recommends that the document do more to address unsustainable land use planning decisions and practices within the metropolitan area before resources are extracted from the regions.	Noted.
200300348: City of Bunbury	20	The draft strategy places a strong focus on the development of regional sustainability strategies. In principle, this strong focus is supported, however the development of such strategies cannot be adequately addressed when the document has a clear focus on the transfer of regional resources to continue to 'prop up' the Perth metropolitan area. Current unsustainable land use planning decisions and practices across the state need to be addressed prior to resources being extracted from the regions. In many cases local communities do not have adequate input into regional projects that have significant social, economic and environmental impacts. Regional Western Australia provides significant resources for the State and at present there is very little put back into regional development and promotion of decentralisation. Regional sustainability strategies should be a high priority for government to enact and assist with facilitation in order to illustrate its commitment to such sustainability principles.	Noted.
	21	It is recommended that further emphasis be placed on the investigation and progression by the State, in partnership with local governments, regarding the amalgamation of smaller regional local government authorities to form larger regional councils that could manage and operate on a catchment scale - as is the case with many local authorities on the east coast.	Noted.
	32	The Strategy makes mention of future roles for regional development commissions, there seems no real need for such commissions to exist, they are just another level of bureaucracy. At present the Commission's role is to facilitate between the state and local level. It is of the experience that liaison usually occurs direct with the state that is seen as achieving better outcomes.	Noted.
	33	Any expansion in the role of development commissions would be seen as resource consuming and unnecessary. There is need for a long-term commitment to sustainability across state government agencies, for it to filter through to the local level that is regulated by the state agencies.	In the final Strategy, Regional Development Commissions are not primarily responsible for preparing Regional Sustainability Strategies.
200300368: City of Kalgoorlie- Boulder	6	The proposed regions should follow existing region boundaries (or the existing regions should be modified accordingly) to coordinate with agencies and associations within existing regions. The 'sense of place' documents should also include European heritage and incorporate tourism bodies. The Regional Sustainability Strategies should also take into consideration the regional Planning Strategies that have been developed.	Noted.

Sustainability in the Regions *continued*

200302784: Roebourne-Port Hedland Land Conservation District Committee	8	<p>The strategy appears to be inconsistent in that it recognises the strength of the regions as a basis for sustainability but appears to want to prescribe a 'one-size fits all' approach to the management of pastoral lands. The structural nature of the industry is different between regions depending on: degree of reliance on sheep versus cattle'</p> <ul style="list-style-type: none"> - degree of diversification - carrying capacity of land systems within a region; - lease size; - climate variability; - reliability of rainfall; - level of impact by other industries; - total grazing pressure. 	The final Strategy does not prescribe a 'one size fits all approach' to rangeland management.
	9	The sustainability issues and solutions for the pastoral sector differ from region to region. For example, the 'Gascoyne-Murchison Strategy' was a specific action to the needs of that region – an area largely dependent on sheep/wool enterprises suffering from a prolonged downturn in the wool market, dry seasons, excessive uncontrolled goat population and vegetation decline. Local or regional decision-making will ensure the industry remains sustainable and operates within a wider sustainability framework for the region in which it is based. It is suggested that there be an interrelationship between the sustainability strategy, the Department of Agriculture draft WA 2002 Rangelands Strategy and the development of regional natural resource management strategies.	Noted.
	10	With regard to regional boundaries the existing boundaries as defined under the Regional Development Commissions Act (1993) should be retained as a suitable model for regional identity and decision-making.	Noted.
200302946: LandCorp	11	The draft strategy includes a review of the regional development commissions (1.17), creation of regional sustainability strategies (1.16), regional sustainable business tours (1.18), regional integrated community service plans (5.1) and Reviving the Suburbs Initiative.	
	12	The most successful projects in which LandCorp has been involved have had broad community support, have built on existing strengths of a town or region and have been tested with sound research into the competitive attractiveness of a development.	Noted.
	13	An approach that looks at a town or region as a competitor with locations elsewhere in the State, interstate or overseas and conducts high quality research, can more accurately pin-point how that region can hope to attract and retain residents, investors, jobs and amenity. Towns, suburbs and regions that think like a business and can create a clear strategy to position themselves against the alternatives available to investors, employers, employees, home-buyers and tourists are less likely to be disappointed in their ambitions and more likely to build the capacity of their area to move forward towards more visionary targets.	Noted.

Sustainability in the Regions *continued*

200302946: LandCorp	14	When a strategy based on realistic competitive advantage is drawn up, the supporting elements of a sustainable community can be planned holistically alongside the economic planks of the strategy. Creating economic assets without the networks and 'soft-infrastructure' to support the functioning of those assets will lead to sub-optimal returns and eventually to community dissatisfaction. Purely supply side solutions to regional development or suburban renewal (where demand is not constrained by lack of supply) will not provide the same returns as a whole-of-community strategy based on discovering demand.	Noted.
	15	A necessary step in forming an economic development strategy for a sustainable community should be the bringing together of entrepreneurs – business people, policy entrepreneurs in Government and community leaders. The facilitation of a cohesive strategy to be owned and driven by this supportive network of entrepreneurs is a key leadership role for the Regional Development Commissions.	The suggested need to involve stakeholders in the development of regional strategies is supported.
200303139: Kimberley Development Commission	8	The draft contains a suggestion that all regions prepare "Regional Sustainability Strategies". For such strategies to be effective in creating an enhanced 'triple bottom line' approach to development, methodologies must be developed and agreed within local communities. The development of these methodologies should be conducted in partnership with both implementing agencies and communities. The complexity of these processes should not be underestimated. This work will be time consuming and probably involve using resources beyond the scope of the Commission's current budget. As in other activities recommended by the Plan resources have not been allocated to this activity, and in the current environment seem unlikely to be available.	Agreed. The final Strategy places on emphasis on developing, trialing and reviewing methodologies for the development of regional sustainability strategies.
200302855: Planning Institute of Australia	40	The time span of regional plans and the difficulties associated with implementing many of the principles when dealing with day to day decisions on rezoning, subdivision and development is an issue which has tested the validity and usefulness of such plans	Noted.
	43	It is submitted that the Local Planning Strategy which is required to accompany all town planning schemes since the amendment to the Town Planning Regulations in October 1999 offers the most significant opportunity to "tell the story" of each local government area, provide a vision for the future which is embraced by the community and local government and base this on sustainability principles. The opportunity to prepare such Strategies across local government boundaries is clear and some local governments have already recognized the efficiencies of such an approach. This document has the ability to encompass the issues contemplated in the proposed Regional Sustainability Strategies but with the advantage of approaching the issue from both a broad based economic, environmental and social planning perspective and a local planning perspective.	Noted.

Sustainability in the Regions *continued*

200302855: Planning Institute of Australia	44	To satisfy the Town Planning Amendment Regulations 1999 a Local Planning Strategy should be: --a document prepared in close consultation with the community which explains and justifies the strategic direction for growth and development in a local government area over the next 10 to 15 years. --a document which sets out the direction for economically, socially and environmentally sustainable development based on comprehensive analysis of state, regional and local planning issues and objectives --a document which gives direction both to local government, the Department of Planning and Infrastructure, WAPC and the Minister in assessment of amendments, subdivision, development and provides strategic planning support for sustainable decision making. --a document which provides the basis for coordinated decision making on future servicing of the local government area by local, state government and any other service agency.	Noted.
200303065: City of Gosnells	26	It is important that assistance from state and federal governments in relation to sustainable economic development is not concentrated on non-metropolitan areas, with an assumption that metropolitan local governments have a lesser need. Financial assistance available to local government to promote economic development is very limited with the vast majority of federal government funding aimed at regional, non-metropolitan areas. This focus purely on the regions at the expense of metropolitan areas is unsustainable.	The final Strategy gives significant attention to metropolitan and rural regions.
200305753: Department of Planning and Infrastructure	38	it is essential that these regional activities are placed within a coordinated, whole of government approach and not fragmented. There is a need for the overall regional focus of the DSSS to be clarified and perhaps some of the initiatives to be brought together within a transparent and existing framework.	Noted.
	40 41	However there is a concern that they is an over emphasis placed on the intended quantity and scope of work that local government is to carry out. It is not at all clear that local government is well placed or indeed willing to take on these responsibilities. It would also seem likely that if they were to assume some of these roles they would be seeking additional funding from the State Government. If this were to occur it could lead to either the State funding similar activities in two tiers of Government agencies, or cutting back on funding to State Government agencies while still expecting similar levels of service delivery.	Noted.
200300201: Pearl Producers Association	7	Throughout the document there has been reference to 'regional councils'...Further investigation reveals that these councils are again land based in their emphasis with no marine focus or expertise.	Noted.

Sustainability in the Regions *continued*

200300201: Pearl Producers Association	8	The proposed actions section (p224) goes as far to recommend developing regional sustainability strategies through a regional council process but not proposing how the regional consultative process should be established first!	The final strategy places emphasis on the development of the methodology for regional sustainability strategies prior to their broad implementation.
200301473: North Lake Residents Association	47	Given that the responsibility of environmental advocacy is often cast upon the community, legislation is needed to allow community to be proponents to the EPA, and thus initiate conservation of wetlands and bushplan areas locked into road reserve status.	Noted.
200303139: Kimberley Development Commission	3	It should be recognised within the strategy that the notion of "sustainability" is progressively being broadly embraced globally and it is therefore variously contained in many regional strategies and policies implemented by state government, local government and non government organisations. It is important that this developing work is recognised and incorporated into a statewide approach to prevent duplication and also to ensure local ownership within regional communities.	Noted.
	8	The draft contains a suggestion that all regions prepare "Regional Sustainability Strategies". For such strategies to be effective in creating an enhanced 'triple bottom line' approach to development, methodologies must be developed and agreed within local communities. The development of these methodologies should be conducted in partnership with both implementing agencies and communities. The complexity of these processes should not be underestimated. This work will be time consuming and probably involve using resources beyond the scope of the Commission's current budget. As in other activities recommended by the Plan resources have not been allocated to this activity, and in the current environment seem unlikely to be available.	The final strategy places emphasis on the development of the methodology for regional sustainability strategies prior to their broad implementation.
200303162: R. Chapple & G. Watson, MLC's	2, p. 5	Clear policy needs to be developed to reverse the pattern of political and population centralisation in Perth at the expense of regional	The Government has issued a draft Regional Policy Statement for public comment.
200303268: Diane Matthews	11	Any Regional Development Commissions and Sustainable Business Investment proposals would need to be planned in conjunction with the Department of Environmental Protection, The Department of Agriculture, the Department of Conservation and Land Management, the Biodiversity Conservation Act and the state's responsibilities under Federal biodiversity agreements. A system of criteria and monitoring would need to be created to establish 'ethical' investment within a sustainability model.	Noted.
200302729: Shire of Serpentine- Jarrahdale	5, pg. 7	There needs to be actions that relate to beyond establishing the regional strategies to assessing and refining the strategies as an ongoing process. The State government with regional development commissions could provide a supportive role to ensure that the strategies are implemented and that the tools and skills are available for this to be achieved.	Agreed

Sustainability in the Regions *continued*

200303161: William (Bill) Grace	15	<p>Sustainability in the Regions: One of the prime issues on the agenda of the State – Local Government Roundtable is that of Regional Sustainability Strategies. My own view is that this offers the single most significant opportunity in the Strategy as a whole. There are a number of reasons why I feel this is so important:</p> <ul style="list-style-type: none"> • <i>Sustainability means most when it is applied at a regional scale.</i> This sub-heading captures the essence of the opportunity. People have direct connection with, and understanding of the key issues in their region: jobs, environmental degradation, social problems and the connection between them all. The key to the success of the Strategy will be mobilising ordinary people and their local representatives, and regional strategies can deliver this promise. • The existing regional councils (particularly Eastern Metropolitan Regional Council) provide a starting point for the development of the organisations that can develop and implement regional strategies. • There are many existing organisations such as catchment councils and environmental protection groups that could find a home as affiliates of regional councils in the delivery of the component parts of the regional sustainability strategies. 	Noted.
	15 cont.	With these positives as a starting point, and with careful planning and consultation, the implementation of this recommendation should be both achievable and successful. To achieve optimum benefit however the Regional Councils should incorporate the Regional Development Commissions. This will give them the necessary economic focus, ensure a proper integration with social and environmental considerations and avoid the cost of duplicate establishment.	Noted.
200300307: Hamersley Iron	3, p.3	Hamersley suggests that the Regional Development Commissions have a logical role to play in supporting sustainability throughout the regions. Hamersley also suggests that there is a significant role for industry to play in the creation of Regional Sustainability Strategies; and that a focus on " <i>facilitating development and encouraging job creation in regions</i> " should be included in the list of points on page 59.	Noted.
200303443: State Development Portfolio	46	It is considered that this section of the report (p.58) places undue emphasis on the development of the sense of place concept. There is a need to focus more on the significant economic, social and environmental issues faced by those in regional areas and consider strategies or mechanisms to address these issues. This process must be completed in close consultation with community members in order to achieve their support for any proposed action.	This will be considered as part of the process to develop the methodology for regional sustainability strategies.

Sustainability in the Regions *continued*

200303443: State Development Portfolio	47	The role of local governments and Regional Development Commissions in this process as outlined in the Strategy document also requires review. ..	Noted.
	49-50	Recommendation 1.18 relating to the development of sustainable business investment tours should be deleted from this section of the Strategy document. A more appropriate recommendation would be to examine the current investment attraction tours and related initiatives co-ordinated by the State Government with a view to the pursuit of broader sustainability objectives from these initiatives. These matters would be appropriately discussed in the "Sustainability and Business" section of the document. If this recommendation remains in the document then the Department of Industry and Resources would seek to have involvement in its implementation as it closely relates to other investment attraction activities that are currently underway.	Noted.
200303073: Natural Resource Management Council	Point 7	There is a prominent role given to Local Government in the draft Strategy, and Council members' contact with local government and experience is that it is too ambitious and not completely aligned with the Western Australia Local Government Association's and local shires' thinking. In the NRM area, local government wants to be involved, and they should be. However, they want to be represented in regional NRM groups, but they do not want the process to depend on them. Local government representatives are not elected for their NRM expertise, and councilors tend to be pro-development. Several regional group representatives have had local government experience, but these members have grown beyond the roads, rubbish and rates mentality to want to conserve and preserve our environment and promote sustainability. There are members on the NRM Council (eg. Rex Edmondson and Barbara Morrell) that have served on local government but now are involved in regional, state and national NRM and sustainability issues. Council recommends that further discussions be held with the Western Australian Local Government Association and the Regional NRM Chairs to determine what role local government would like to play, and can play, in regional NRM.	The final Strategy acknowledges the important role of Local Government in supporting sustainability, but emphasises the importance of considering the appropriate roles that Local Government performs.
200303590: WA Collaboration	6, pg. 4	1.16 The WA Collaboration queries whether developing Regional Strategies immediately is appropriate, without determining who will have ultimate responsibility for these Strategies and whether there will be adequate funding for their development and implementation.	This will be considered as part of the process for reviewing and developing the methodology for these initiatives.

200303590: WA Collaboration	Rec. 35	<p>Regional forums for sustainability</p> <p>As a precursor to developing Regional Sustainability Strategies and to maximise the extent to which current programs and funding can be reoriented towards sustainability, the State Government should first develop regular open forums or roundtables at a regional level that bring together the major stakeholders to build partnerships, and to network and coordinate across sectors. These forums must be adequately resourced and supported by the State Government and organised through the Regional Development Commissions in the interim, pending the review of the structure of Regional Development Commissions (see Recommendation 36).</p>	Noted. This could be considered as part of the process to develop the methodology for regional sustainability strategies.
	Rec. 36	<p>Role of the Regional Development Commissions</p> <p>The State Government should thoroughly investigate the potential for restructuring the Regional Development Commissions to encompass sustainability. This needs to be more substantial than a token addition of sustainability principles and functions. It is likely that a comprehensive review of the role and performance of the Regional Development Commissions will be required.</p>	The final Strategy indicates that the Regional Development Commission Act 1993 will be amended to ensure that the activities of the Commissions are consistent with Sustainability Principles.
200303494: WA Planning Commission	3.27	As in the examples above, the proposed establishment of an additional layer of planning does not adequately acknowledge the existing roles and responsibilities of agencies like the Commission. Regional Strategies and Plans have been prepared for the State consistent with the SPS. Whilst they are necessarily broad in nature, they seek to provide a strategic context for infrastructure provision, settlement planning, and subsequent consideration of local plans and development proposals. They therefore play an important role in the planning hierarchy. The current proposals in the DSSS (Actions 1.16 and 1.17) should take into account the present role of the Commission in regional planning matters, and provide clarity on the anticipated roles and responsibilities of key stakeholders in the planning process.	The final Strategy acknowledges the role of the Commission in regional planning and specifically in the development of methodologies for Regional Sustainability Strategies.
200300358: F. Schnattler	Sec. 3.5, pg. 2	The community needs to be educated about the Regional Development Commissions Act 1993. What's about an RDCA 1993 information evening in the Alexander Library?	Noted.
	Sec. 3.5, pg. 3	Conduct two BEvolutionary Business Investment tours per region per year to attract investment (including 'ethical' investment).	Noted.

Indigenous Communities and Sustainability

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	20	The development of Indigenous Regional Sustainability Strategies (Action 1.19) would form a key social and cultural component of the Regional Sustainability Strategy. Assisting Indigenous communities in the establishment of cultural interpretive centres (Action 1.21), expanding Indigenous Cross-Cultural Awareness Training (Action 1.22) and working with communities to target employment and housing opportunities (Actions 1.23 and 1.24) are key actions that would improve the reconciliation process with Indigenous communities and Local Governments.	Noted.
200300307: Hamersley Iron	19	Hamersley believes that the ground-breaking work being undertaken by mining and resources companies in reaching land use agreements and regional agreements is worthy of more prominence in this section.	This is acknowledged in the final Strategy.
	20	In particular the dot point on page 62 with reference to employment and training for Indigenous people reflects only part of what progressive mining companies are undertaking. A more inclusive statement would be: <i>The move by mining companies to sign long term land use agreements which provide a range of benefits including financial payments, provision for cultural and heritage management, employment and training, support for small business development and community infrastructure.</i>	This is addressed in the final Strategy.
200300368: City of Kalgoorlie- Boulder	7	Indigenous housing needs should be addressed in that house design should reflect their cultural requirements. It is suggested that Indigenous people should be encouraged into health services for employment opportunities.	Noted.
	8	Development of Indigenous businesses and industries will enhance the sustainability of these communities. Training in all facets of business development will assist this endeavour. Specific target industries, particularly in the mining regions should include, bush tucker, mine-site rehabilitation and exploration works. Through increased Indigenous business and employment opportunities, communities will develop their own sustainable outcomes.	Noted.
200311216: Zoe Moore	20	This entire section is an offensive, racist and insensitive display of the government's lack of commitment, respect and understanding for Indigenous Australians. Paragraph 3 of this page is outrageous and suggests that 'industry's development proposals and security for Aboriginal people's cultural heritage and values must be equally respected within the overall development of the State'.	Noted.

Indigenous Communities and Sustainability

200311216: Zoe Moore	21	This paragraph is representative of the attitude displayed in the remainder of this section and the entire consultation draft. The State Government shows contempt for the inalienable rights of Aboriginal people to Australian land, land which they have occupied and managed sustainably for at least 40 000 years. Land on which their ancestors have lived and died on and with which they have an intrinsic connection. The State Government maintains their scorn of Indigenous Australians by consistently refusing to apologise for the genocide experienced by their ancestors and so is derisive of the Reconciliation movement.	Noted.
	22	Last para. 'New and just relationship between Govt WA and Ab. West Australians'. scope? commitment?	Noted.
	23	p62 last bullet point of 1 st paragraph. The proposal to employ Indigenous people in the rape of their own land is sick and highly offensive	Noted.
	24	2 nd lot of bullet points How about facilitating healing and trusting the capabilities of Indigenous people to order and deal in their own affairs?	Noted.
	26	Last 3 paragraphs are diabolical : 'social probs. due to lack of employment because of lack of edn. and training' how about cultural loss? impact of continued invasion and forced cohabitation with descendents of those who committed genocide on their people? identity loss?	Noted.
200302958: Swan Valley Nyungah Community	2	Re: paragraph 1. While we are glad to see that this paper is recognising our Links, Ties and Connections to our Land and Water, and while we take our responsibilities as Caretakers to our Land very seriously, we have not had cooperation or understanding from State Governments when we try and protect the Sacredness of our Land and Waterways.	Noted.
	4	Re: paragraph 2. We have been here since the Beginning of Time. It is the ignorance of whitefellas that has forced us into poverty. We know our Religion and Culture. It is because our Religion and Culture not recognised (except in words) by Government that we are having so many problems.	Noted.

Indigenous Communities and Sustainability

200302958: Swan Valley Nyungah Community	6	Re: paragraph 3. We noticed that you put 'wealth creation' first. As long as that is your first consideration, you and the State will remain poor, no matter how much money you have. Our Spiritual Dreaming is wise. You should be taking advice of the Elders of this State and not be swayed by developers, mining interests and Government advisers. If you do the right thing by the Land it will do the right thing by you.	Noted.
	8	Re: paragraph 4 We note that you understand that circumstances can differ. However, your recommendations further on do not reflect these sentiments. Negotiations need to take place with the Elders of an Area. A regional approach will simply disempower those who keep the Laws and Sacredness of their area.	Noted.
	10	Re: paragraph 6, first bullet. We would like to know who has signed this agreement and what does the agreement say? Are all Grassroots Mainstream Aborigines going to have input into this agreement or is it just going to be signed by Indigenous people chosen by the Government?	Noted.
	12	Re: paragraph 6, second bullet. The groundswell has come from Government policy and, while we have always worked according to our 'cultural groupings' and 'country', the Government is now defining what these groupings should be. This is just another example of how the whitefella dictates to us listening to us.	Noted.
	14	Re: paragraph 6, third bullet. This would be fine if the Government wasn't trying to decimate the Single Native Title Claims Group so that the only 'representatives' were those of the Government's choice.	Noted.
	16	Re: paragraph 6, fourth bullet. Many environmentalists and ecologists are hired by developers and mining interests to further the interests of the greedy. There should be more than 'Indigenous community interaction with Indigenous Lands.' We have had that since the Beginning of Time. These 'scientists' must understand that we carry a wealth of Knowledge about our Land and Waterways and they must learn to listen. Many currently do not.	Noted.
	18	Re: paragraph 6, fifth bullet. Many of these 'initiatives' were 'forced' upon mining companies because the land was stolen from the Aboriginal People and in order to make it look all right, they offer crumbs back. This has not resulted in better health or lifestyle for our People.	Noted.

Indigenous Communities and Sustainability

200302958: Swan Valley Nyungah Community	20	Re: paragraph 7. First of all, this is the whitefella way of doing things, not the Blackfella way. By working from the top down (ATSSIC) with a group that does not represent the majority of Mainstream Grassroots Aboriginal People, and thus does not represent the majority of Caretakers of the Land and Waterways, you are once again defining what is best for us instead of listening to our Wisdom and Knowledge	Noted.
	23	Re: paragraph 8. The system recommended in this section does not address the Blackfella way of doing things. The recommendations ignore or convolute Steve Kinnane's premise that 'processes for strategic policy development be anchored in community-based programs'.	Noted.
	26	Re: paragraphs 9 & 10. This seems to be in direct contravention of the <i>Aboriginal Heritage Act, 1972</i> . It shows absolutely no understanding of the Connections to the Land and Waterways and further disempowers Aboriginal People, their Culture and their Religion.	Noted.
	27	This whole section shows a total misunderstanding and disregard for the Knowledge, Culture and Religion of Aboriginal People. It delegates us to a second-class position in this society where we will continue to be dictated to by Government policies that are based on development at a cost to our Land and Waterways. When will you properly consult with Grassroots Aboriginal People and not Government Departments and Agencies which have a totally different agenda to that of Mainstream Aboriginal People.	Noted.
200302855: Planning Institute of Australia	46	There is a need to resource the Aboriginal Lands Trust [ALT], as the manager of the third largest landholding in the State. This particularly relates to the regulation of land use and development on ALT lands. It is vital that the ALT be resourced to manage its estate effectively, and to ensure that Aboriginal people are empowered to look after their community land	Noted.
	47	It is essential for Government agencies to learn to work effectively with Aboriginal people, in ways that are culturally appropriate to different areas. Government agencies should not rely on a 'one size fits all' approach to their policies or programs, particularly in regions of WA where there are high proportions of Aboriginal people, i.e. Kimberley, Pilbara and Goldfields.	Agreed. The final Strategy includes an action for increased cultural awareness training for public servants that work with Indigenous people.
200303065: City of Gosnells	27	It is important to include indigenous communities within the metropolitan area, and provide resources to these local governments to assist in developing the actions listed.	Noted.

Indigenous Communities and Sustainability

200303268: Diane Matthews	12	Sustainability will require partnerships of technical and practical training between all parties involved in the management of natural assets in order to protect the asset and conserve it for the future. A common aim for long-term sustainable custodianship of the lands and waters should provide opportunities for sharing of knowledge and skills.	Noted.
200303425: Fire and Emergency Services Authority of WA	5, pg. 3	It also held that, in order to attain comprehensive healthy and safe environments in Indigenous communities, the "Planning for Aboriginal Communities" SPP needs to take into account community proneness to natural hazards including flooding.	Noted.
200303160: Goldfields Esperance Development Commission	Page 5	Our region has a high population of Indigenous people and the development of an Indigenous Regional Sustainability strategy to tie in with a local plan is sound, and something we would naturally do. This Indigenous Regional Sustainability Strategy must have Federal Government support. Further detailed comments regarding actions relating to Indigenous issues are on a separate report.	Noted.
200300307: Hamersley Iron	4-5, p.3	<p>Hamersley believes that the ground-breaking work being undertaken by mining and resources companies in reaching land use agreements and regional agreements is worthy of more prominence in this section.</p> <p>In particular the dot point on page 62 with reference to employment and training for Indigenous people reflects only part of what progressive mining companies are undertaking. A more inclusive statement would be:</p> <p><i>The move by mining companies to sign long term land use agreements which provide a range of benefits including financial payments, provision for cultural and heritage management, employment and training, support for small business development and community infrastructure.</i></p>	This is addressed in the final Strategy.
200303443: State Development Portfolio	51	The opening statement material in this section (p.61) appears to be contradictory in referring to the adoption of an integrated social, environmental and economic perspective over numerous generations and suffering high levels of deprivation. The Strategy should refer to the fact that Indigenous populations have demonstrated the adoption of sustainability principles despite the difficulties many individuals have faced in terms of social, economic and health indicators.	Noted.

Indigenous Communities and Sustainability

200303312: Department of Conservation and Land Management (CALM)	Pg 6	<p>The draft Strategy nominates Steve Kinnane's background paper, <i>Beyond the Boundaries – Exploring Sustainability Issues within a Regional Focus</i>, as the preferred strategy to achieve sustainability for Aboriginal communities. The Strategy nominates short, medium and long-term strategies to use Community Ranger Schemes, also known as Indigenous Country Management Programs, as the major initiative in achieving sustainable solutions to Aboriginal community development.</p> <p>This Department does not decry the role of such initiatives for Aboriginal community development. However, Steve Kinnane's background paper contains some very disconcerting suggestions that have the potential to alienate the Government from its core environmental obligations and commitments. While the Department will not critique the background paper, as it is regarded as only a background paper that stimulates informed debate and consideration of the issues, it does believe that the paper is not aligned with the established Westminster system of Government in Western Australia.</p> <p>The aspirations presented on page 25 of the background paper are unattainable and more importantly, economically and environmentally unsustainable. The dismantling of this Department and the devolution of its responsibilities to Aboriginal entities is based on the premise of the independent sovereignty of indigenous people and their right to manage the land according to indigenous law. This is spelled out in the following quote from the paper</p> <p><i>"Within a whole-of-government approach the resources that would traditionally have been based in (the Department of) Conservation and Land Management would be devolved to regional Aboriginal Country Management programs. These would likewise operate in a collaborative manner with other mainstream conservation and resource management agencies, but in a role of management of recognised Indigenous Countries, rather than as a consultative arrangement."</i></p> <p>This Department is concerned that the protection of biodiversity and management of lands for the benefit of the Western Australian community could be seriously jeopardised by such an approach. The Department has adopted a non-adversarial approach which seeks to bridge the gap between traditional Aboriginal customs and responsibilities for caring for the country and the need to address the contemporary threatening processes introduced through European settlement. The Department believes that this approach to land management should not be compromised</p>	Noted.
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Indigenous Communities and Sustainability

200303443: State Development Portfolio	52-57	<p>There is also concern that the opening quote from the Department of Indigenous Affairs appears to indicate that the solution to the above difficulties lies in the identification of appropriate governance structures. This suggests that such structures are already in existence, when it may be more appropriate to work with these representatives to develop appropriate arrangements in areas such as health, housing, education, social welfare, employment and training.</p> <p>It is considered that this section of the Strategy should be re-worded to remove the reference to "...the essential preconditions ofsubstance abuse, domestic violence..." as these issues are barriers to sustainability rather than being preconditions to sustainable development.</p> <p>The material on wealth creation should also refer to "Aboriginal peoples' spiritual and cultural heritage and ecological values..". Similarly, the fourth paragraph of the section should be reworded to move through from the micro to macro issues in relation to the circumstances faced by Aboriginal people.</p> <p>In addressing the constraints to sustainability (page 61) it is suggested that the first point should refer to the negotiation of compromise outcomes, "win/win" solutions and the recognition that the lack of ability to change such patterns is largely based on the structuring of these relationships/law systems. Accordingly, it would be inappropriate to attempt to change these systems. In relation to the term capacity building it is also important to define what this means in the above context.</p> <p>The second point in this section should refer to the aim of long term change to enable informed decision making processes to promote empowerment at the individual, family and community levels. The third point should refer to "an inadequate service partnership model for Indigenous social and economic development".</p> <p>The fourth point referring to the emphasis on commercial resource use in the management of Aboriginal lands with limited consultation with Aboriginal people should be removed as it is incorrect. Similarly the fifth point noting the inability to tap the groundswell movement within WA Aboriginal communities is also incorrect as there are a number of forums/mechanisms in place to achieve this facilitation including the Commonwealth Native Title Act, development of Regional Heritage Agreements (as recommended by the Technical Taskforce on Mining Titles) and also the important work undertaken by the Aboriginal Economic Development section of the Department of Industry and Resources.</p>	<p>Noted.</p> <p>This has been addressed in the final Strategy.</p> <p>This is addressed in the final Strategy.</p> <p>Noted.</p> <p>Noted</p> <p>This has been addressed in the final Strategy.</p>
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Indigenous Communities and Sustainability

200303443: State Development Portfolio	58-64	<p>The references in the report to the promising opportunities from sustainability (on pages 61-62) should in the third point also refer to the work of anthropologists and archaeologists. The fourth point in this item should refer to the growth in mining and petroleum company initiatives for training and employment of Indigenous people.</p> <p>The following material relating to work of the Government with the Aboriginal and Torres Strait Islander Commission is supported, with the suggestion that the final point should refer to the economic position rather than the wealth of Aboriginal people.</p> <p>The recognition of the efforts of mining companies towards the training and recruitment of Aboriginal people (on p.63) is supported, however the reference to specific targets is problematic, particularly as a number of other mining companies boast significantly higher rates of aboriginal employment albeit on a lower employment base (e.g. Rewah Diamond Drilling in the Kimberley region employs 12 Aboriginal people in a total workforce of 25 persons).</p> <p>Comments referring to the social charter of sustainability assessment should advise that companies show how they will contribute to training and employment of Indigenous people. Currently notices of intent for mining development only consider aboriginal heritage issues, although these could be extended to include training and employment opportunities.</p> <p>The second point in the listed objectives also requires modification to clarify the reference to sustainable management of resources and whether this relates to Government funding or physical resources such as land and waters. The fourth objective also needs further definition as to what is intended by "capacity building" for Regional Indigenous Sustainability Strategies. The fifth objective also requires modification to delete the reference to governance to be replaced by "stakeholder interests in the affected land and waters". This is facilitated through instruments such as the Commonwealth Native Title Act, Aboriginal Heritage Act (WA) and the Aboriginal Land Protection Act (WA).</p> <p>In respect of the proposed actions it is recommended that item 1.22 relating to Indigenous Cross-Cultural Awareness training be extended to all public servants rather than just those who have an involvement with Indigenous people or associated policy issues.</p> <p>The Portfolio supports Proposed Action 1.23 on targets for Indigenous employment and it is suggested that the wording "as is occurring through the tripartite negotiation process in compliance with the Commonwealth Native Title Act 1993" be added to the end of the item.</p>	<p>This is addressed in the final Strategy.</p> <p>This is addressed in the final Strategy.</p> <p>This has been addressed in the final Strategy.</p> <p>This is addressed in the final Strategy.</p> <p>Noted.</p>
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Indigenous Communities and Sustainability

200303443: State Development Portfolio	65-66	<p>Proposed Action 1.24 is also supported with the suggested rewording "Continue to work in a collaborative manner with Indigenous Western Australians to enhance housing and health programs to address their requirements."</p> <p>The Indicators and Targets are supported with the suggestion that the third item also list some examples of these governance structures including the use of Aboriginal health specialists, etc.</p>	<p>This has been addressed in the final Strategy.</p> <p>All indicators and targets have been removed from the final Strategy.</p>
200302729: Shire of Serpentine- Jarrahdale	6, pg. 7	There needs to be support and acknowledgment of the local knowledge that the indigenous community have. Their intellectual property also needs recognition and the value of it to be incorporated into sustainability and in particular environmental actions.	Noted.
200303590: WA Collaboration	4, pg. 5	More consultation/participation with indigenous communities – are more strategies really what is required??	Noted.
	Rec. 14	<p>Joint management of National Parks and Conservation Reserves</p> <p>The State Government should expedite the identification and development of joint management programs for National Parks with traditional owners, based on sustainability criteria and opportunities for economic development for Aboriginal people. This would include the allocation of adequate resources to enable joint management regimes to be effective.</p>	This is addressed in the final Strategy.
	Rec. 18	<p>WA Indigenous Economic Strategy</p> <p>The State Government should allocate sufficient funds to ensure the implementation of the WA Indigenous Economic Strategy which is being developed with ATSIC, state agencies and other key stakeholders.</p>	Noted.
	Rec. 34	<p>Aboriginal Governance and Capacity Building Institute</p> <p>International research has demonstrated that one of the key factors in sustainable and economically independent Aboriginal communities is the development of culturally appropriate institutions of self-government. The Western Australian Government has committed to working with Aboriginal communities to build their capacity, governance and leadership. The State Government should fund the establishment of an Aboriginal Governance and Capacity Building Institute.</p>	Noted.

Indigenous Communities and Sustainability

200303590: WA Collaboration	Rec. 20	<p>Sustainable Aboriginal communities</p> <p>To meet the commitment to an effective and sustainable partnership with Aboriginal communities, the Government of Western Australia will need to:</p> <ul style="list-style-type: none"> • recognise the continuing rights and responsibilities of Aboriginal people as the first peoples of Western Australia, including traditional ownership and connection to land and waters; • provide legislative protection of Aboriginal rights; • ensure equity with respect to citizenship entitlements; • apply regional and local approaches to address issues that impact on Aboriginal communities, families and individuals; • maintain their commitment to democratic processes and structures; • ensure inclusiveness; • address issues arising from past acts of displacement; • provide Aboriginal Cross-Cultural Awareness Training for all Western Australian public sector employees; • negotiate separate agreements in health, housing, essential services, native title, justice and other areas that impact on Aboriginal people in this state; • resource programs that improve governance, capacity building and economic independence; and <ul style="list-style-type: none"> ▪ work with industry and the private sector to enter into agreements with Aboriginal people. 	Many of these matters are addressed in the final State Sustainability Strategy.
	Rec. 38	<p>Aboriginal regional agreements</p> <p>The Statement of Commitment provides for the development of comprehensive regional and local agreements according to the priorities of Aboriginal people in partnership with other stakeholders. The development of appropriate local agreements should be actively pursued.</p>	Noted.
200306828: WA Aboriginal Native Title Working Group	3,p.4	Accordingly, the objective as quoted at the beginning of this section from the Consultation Draft is no longer one which is valid except in the case of very few Indigenous groups on WA. Basically, native title and the native title regime will provide sustainable outcomes for only very few Indigenous people. Perhaps the objective should begin with the words "Where applicable" to reflect the reality of the native title regime.	The objective in the final Strategy has been amended.

Indigenous Communities and Sustainability

200306828: WA Aboriginal Native Title Working Group	6, p.4	<p>If native title promises so little within a sustainability framework, it is important to seek alternatives which will provide sustainable land based outcomes for the Indigenous community of WA. This goes beyond the current scope of the objectives as listed on page 63 of the Consultation Draft, and involves the state moving towards developing a policy and legislative framework which:</p> <ul style="list-style-type: none"> -Recognises traditional owners and protects customary rights and law. -Provides land tenure outcomes which will enable people to develop economically and socially within Governance structures that are more appropriate. 	Noted.
	1, p.5	<p>While not so called "sustainable" outcomes in themselves, these two major areas of reform have the ability to greatly contribute to the social, cultural and economic well being of Indigenous communities for long into the future. Further, they reflect the State Sustainability Strategy foundation principle that "recognises that an environment needs to be created where all people can express their full potential and lead productive lives..." (p28, State Sustainability Strategy Consultation Draft). Currently, this environment does not exist in WA, hence the need for fundamental reform rather than ones that build on the current system, one which is corrupted y WA's colonial past.</p>	Noted.
	3, p.7	<p>Recommendation</p> <p>The state move to legislate to</p> <ul style="list-style-type: none"> -Recognise traditional owners, irrespective of native title outcomes, as the cornerstone of its Indigenous affairs portfolio and activities -Support the ongoing maintenance of customary law and culture -Seek to reflect this position in existing and new legislation continued access, hunting and fishing rights -Enable Joint Management on the conservation estate to occur -Develop an appropriate mechanism for a state based Indigenous Protected Areas programme <p>It is further recommended that the state develop a sustainability policy framework which seeks to guide agencies and Government alike to ensure that their activities, policies and legislation, both present and future, do not further erode the ability for the States Indigenous people to carry out their customary law and culture as required by Indigenous law.</p>	Noted.
	1, p.8	<p>A further issue that faces Indigenous communities and renders sustainable community development virtually impossible is the fact that there is no appropriate Indigenous land tenure system in WA.</p>	Noted.

200306828: WA Aboriginal Native Title Working Group	4, p.10	<p>Recommendation:</p> <p><i>In the manner of the Northern Territory, the Government must legislate to develop an Inalienable Indigenous Freehold Tenure which will allow:</i></p> <ul style="list-style-type: none"> • True ownership of lands • Control of Access • A Governance structure that is culturally appropriate • Investment and development to occur <p>In the manner of the Northern Territory, and that Government legislates to convert all Part III reserves to this land tenure so as to allow transfer of ownership as recommended in the Bonner Review of the ALT.</p>	Noted.
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Research and Development for Sustainability

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	21	The proposed establishment of a Global Centre for Sustainability in Western Australia (Action 1.25) and various other research initiatives (Actions 1.26, 1.27 and 1.28) will benefit Local Government and their communities and seek to establish Western Australia as leaders in sustainability.	Noted.
200218455: Ord-Bonaparte Programme	34	From an R&D perspective, the role of government is to support the research necessary to make informed decisions about development and consider alternative futures, and to ensure equity and transparency in decision-making processes. Government also has a role in providing incentives to community and industry for becoming more sustainable and disincentives to initiating and/or continuing unsustainable activities.	Noted.
200300368: City of Kalgoorlie-Boulder	9	Programs similar to the Healthy Country initiative in the South West of WA should be implemented in all regions.	Noted.
200301136: Garry Baverstock	8	I am sure the government realises that solid policies and government regulations must be based on reality rather than perceptions, especially if it is going to deliver outcomes, reduce greenhouse gases. For this reason, the strategy will only be successful if the process ensures comprehensive research before action occurs.	Noted.
	9	Therefore it is imperative that the government supports collaborative and independent research, analysis, surveys and reports. It is critical for this process to be successful in the medium and long term. This means the strategy should engender open minded, factual and not necessarily, quick reactionary responses.	Agreed. The final Strategy generally supports learning by doing approaches.
200301216: Zoe Moore	27	Box 12 – biodiversity research?- stop destroying their habitats etc	Noted.
	28	Box 13. This CALM initiative is typical of CALMs commitment to bad land management and complicity with the interests of development. As usual, the root of the problem is not dealt with (in this case, salinity) and a destructive technique is used under the banner of 'best practice'.	Noted.
200302959: City of Fremantle	12	The City of Fremantle would like to see research focussed on local communities and individual behaviour within the different sectors and environments in order to make the research outcomes more practical and relevant.	Noted.

Research and Development for Sustainability *continued*

200300089: Phil Thompson	12	Quote by CCI: “.... generating sustained economic growth.” This is a good example of how ‘sustainability’ has been bastardised over recent years, particularly by economists and those involved in ‘big business’. An economy cannot keep growing in perpetuity and therefore such growth cannot be called sustainable.	Noted.
200218455: Ord-Bonaparte Program	3 – 4	<p>In the <i>Sustainable Development of Tropical Northern Australia: R&D for Management of Land, Water and Marine Resources</i>, Johnson <i>et al</i> (1999) identified a number of challenges to the sustainable planning and management of natural resources in northern Australia from existing literature and discussions with a broad range of stakeholders. These were: <i>Planning Systems</i></p> <ul style="list-style-type: none"> □□□The constraints imposed on planning and management by the paucity of social, economic, ecological, ethnobotanical and ethnographic data. □□□The need for natural resource management (NRM) activities to be effectively underpinned by high quality technical support. □□□Increasing development pressure occurring within a context of poor data availability (especially in the marine environment), particularly a lack of data at a relevant scale. □□□Limited process understanding in terrestrial, aquatic and marine systems (most process understanding exists at plot, point or plant community scale). □□□The need for institutional arrangements to facilitate broad stakeholder representation/participation in regional decision-making. □□□Limits on available human and financial resources are a significant constraint. □□□In order to establish the necessary preconditions for R&D to support effective planning and management, there is an urgent need for capacity development in many stakeholder groups. 	Noted.
	5	<p><i>Integrated Resource Management</i></p> <ul style="list-style-type: none"> □□□The need for NRM R&D to focus at multiple spatial and temporal scales. □□□The importance of addressing human and cultural context and diversity in values. □□□The need for improved coordination of NRM R&D functions within and between agencies. □□□The need to enhance transfer of information between researchers, managers and key stakeholders across catchment, estuary and marine systems. □□□The need for integrated decision-making across terrestrial and marine environments. □□□The need for active and effective community involvement in planning and management. □□□The critical importance of negotiation and conflict resolution strategies. 	Noted.

200218455: Ord-Bonaparte Program	6	<p><i>Indigenous Resource Management</i></p> <p><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/>There is a lack of effective recognition of indigenous aspirations and rights in NRM, particularly the lack of incorporation of native title into broad land use objectives.</p> <p><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/>Indigenous communities/agencies are poorly resourced for participation in NRM processes.</p> <p><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/>Integration of indigenous knowledge with agency-based NRM practice. Parity between indigenous tenure systems and agency management boundaries, or recognition of the distinction between them at a management and jurisdictional level.</p> <p><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/>The need to address social/community issues within a NRM context.</p> <p><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/>Development of multiple use strategies on indigenous controlled land so as to achieve viability in landowners' terms.</p> <p><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/>Capacity building to assist in planning and management by traditional owners. (Johnson et al 1999 after CSIRO 1999, p 4).</p>	Noted.
200303268: Diane Matthews	13	I support these proposed actions with the proviso that there is a need here to consider bio-security. We have one of the world's 26 biodiversity 'hot spots' in our South West – a National treasure that needs protecting from exploitation and degradation.	Bio-security is emphasised in the final Strategy. See <i>Sustainable agriculture</i> .
200217800: Michael Bell	13	at present the C.S.I.R.O. advise against deep water bores for the Gngarrarra mound and the Water Authority is going ahead regardless!	Noted.
200303160: Goldfields Esperance Development Commission	Pg. 5	The establishment of a Global Centre for Sustainability to address local and global challenges in theory is a positive move in the long term and would help demonstrate this to the world. On a local level, recognition with awards is a practical "quick-win". Anecdotally the WA Tidy Towns competition is now focused on sustainability and entries have dropped substantially, as well as the national competition. This may indicate a lack of knowledge about sustainability in the community.	Noted.
200303092: Housing Industry Association (HIA)	6, p.10	HIA supports research and development within the housing sector to improve the sustainability of the construction of houses and operation of houses and recommends that the final report adds such a proposition to its Proposed Action List (p 69).	The final Strategy acknowledges the importance of research in this area. See <i>Building sustainably</i> .

200303092: HIA	7, p.10 1, p.11	Proposed Actions 1.25 to 1.28: These actions should be expanded so that the determination/discussion etc of these priorities and partnerships should also include agencies, industries and the community. Consultation and cooperation of all relevant parties in 'each' area of sustainability should guide where possible by consensus of all involved to ensure that research and development expenditure is directed towards the priorities of all stakeholders, and not just scientists.	Noted.
200303443: State Development Portfolio	67	Whilst the principles supporting the need for research and development on sustainability issues are to be encouraged, it must be recognised that duplication or replication of research efforts is not efficient. Government should fund research only under those circumstances where it can be justified in terms of public benefit considerations, and where such research is unlikely to be funded from other sources. Such funding can also be leveraged through appropriate partnerships with other funding bodies.	Noted.
200309737: Office for Women	17	The State Sustainability Strategy currently holds a number of opportunities for the inclusion of gender equity principles. They include ensuring that: . ensure further research and development into gender and sustainable development	This has been addressed in the final Strategy.
200302729: Shire of Serpentine- Jarrahdale	1, pg. 8	The research outlined in the strategy focuses on scientific research and that technology will provide all the answers to our future sustainability problems. There are many areas of research that need to be supported especially how to we educate and empower people to achieve sustainability.... Scientific technologies and innovations aren't going to be the only solution for achieving a more sustainable society. There needs to be research into a broad range of areas that addresses all the issues of change in society to achieve sustainability in particular consumption which is the biggest problem facing Western Australia.	Agreed.
	2, pg. 8	<i>Objectives</i> Expand to include initiate research which targets consumption.	Noted.
	3, pg. 8	<i>Proposed Actions</i> Ensure the Global Centre for Sustainability is not a science based research facilities but addresses all academic areas of research and looks at the integration of sustainability through everything. Instead of continuing to support bids for research that relates to sustainability, if the strategy is taking a holistic approach to implementing sustainability in WA it needs to work towards sustainability being addressed in all research undertaken.	Agreed.
	4, pg. 8	<i>Indicators and Targets</i> Reduction in consumption per capita in Western Australia	Noted.

200300358: F. Schnattler	Sec. 3.7, pg. 1	Provide information about its activities on TV Channel 31 four times a year. Preferred time slot: the evening.	Noted.
	Sec. 3.7, pg. 2	If the federal administration, ie. the Commonwealth, does not provide funds for BEvolutionary research programs that are of essential importance to Western Australia, then seek international, other national, or state partnerships. Provide funds for such an eventuality, and work out which payments to the Commonwealth shall be cancelled due to the financing need for essential BEvolutionary research programs within Western Australia.	Noted.
	Sec. 3.7, pg. 4	What is the Healthy Country initiative in the South West of Western Australia? Where is information available about the Healthy Country initiative?	See www.csiro.gov.au

Sustainability Information Online

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	22	The establishment of a Sustainability Online service (Action 1.29) will assist Local Government, community, schools and universities to access relevant information about sustainability from a central place.	Noted.
200300368: City of Kalgoorlie- Boulder	10	The Sustainability online has many positive possibilities such as linking to regional portals. Accessibility to the internet to low income families will need to be addressed such as subsidising computer access in local libraries.	Noted.
200301136: Garry Baverstock	10	The one stop shop for government services, updates on policy outcomes and endorsement of industry/professional milestones is a very exciting development.	Noted.
200302856: City of Stirling	13	The concept of a sustainability information website (p 70) is supported, especially where it could provide best practice examples or standardised procedures that can be adopted by local councils, without the need for large investments in researching techniques and tools. <i>This action is generally supported.</i>	Noted.
200302880: City of Wanneroo	25	Action 1.29 - An on-line information system can be a useful and informative tool, however an equity issue exists that such information is not uniformly accessible. Consideration should be given to means in which to reduce this inequity.	Agreed.
200303065: City of Gosnells	28	The expansion of existing information systems to achieve a 'one-stop-shop' for sustainability information is strongly supported. However, care must be taken to avoid duplication of other services or potentially isolating sustainability issues from existing areas. It is essential to recognise that 'sustainability' is not a product in its own right - rather it is a process of modifying the way that we carry out all of our current activities.	Agreed.
200300089: Phil Thompson	13	It is agreed that information and monitoring is very important and it is particularly important that appropriate indicators are used eg. the size of urban areas: if they are continuing to grow then we should conclude that this is not sustainable.	Noted.

Sustainability Information Online *continued*

200300367: Clive Malcolm	3	As a concerned citizen I see a major challenge being to convince ordinary people that they have a responsibility for putting sustainability into practice in everyday life and that what they do is vital....provide a way for ordinary people to communicate about their ideas and practices. We have just returned from an overseas trip on which we discovered about the way plastic bags are being taxed in Ireland and how people deal with that, how people in Galway are banding together to clean up their river mouth, how people in the village of Bedgelert in Wales are having a Sustainability Fair and so on. With the lack of interest of the media in little and positive things these events do not receive widespread coverage. We cannot all know about everything but maybe the 'one-stop-shop' could include a section for people to report ideas and actions for sustainability at the local level.	This suggestion could be considered in the development of Sustainability Online.
200303268: Diane Matthews	14	This proposal would be an opportunity to include the information service required under the State Weed Plan.	Noted.
200309647: Communications Advisory Committee		The sustainability draft appears to overlook such lesson of history, despite the "hope" for a "Sustainability On Line" service.	Noted.
200303160: Goldfields Esperance Development Commission	Pg. 5	Many regions have well established and maintained web sites and they could be aligned to a 'sustainability on line'. product. This would also be a good teaching tool for students at all levels. Development Commission web sites could be considered for this.	Noted.
200303443: State Development Portfolio		Proposed action 1.29 relating to the development of a "one stop shop" for sustainability information is not supported... There is also no indication in the Strategy as to what might constitute "sustainability information" or what level of access the general public would have to such information. A particular concern may be that the kind of information required for this site to be meaningful may include commercial or confidential information. The experience with "one stop shop" information sites is that their usage does not always extend beyond a core group of users and they may not be the most appropriate medium to deliver this kind of information to the wider public audience...	Noted.

Sustainability Information Online *continued*

200302729: Shire of Serpentine- Jarrahdale	5, pg. 8	<i>Vision</i> Expand the one stop shop to be for all government agencies including local government and peak bodies such as the WA Collaboration. If it is truly to be a one stop shop it should incorporate as much as it can.	This could be considered in the development of Sustainability Online.
	6, pg. 8	<i>Proposed Actions</i> Action 1.29 Implies that the online information site will primarily contain data. What also needs to be on the site are stories and case studies, tools available, links to solutions being undertaken in other parts of the world, key people and contact bodies. It needs to be inclusive of all quantitative and qualitative material on sustainability that would be useful. There also needs be support and a long term focus with dedicated staff collecting and disseminating information. The web site will need to be a living changing document.	Agreed.
	1, pg. 9	<i>Indicators and Targets</i> Amount of information available on the web site Amount of times the site is accessed daily	All indicators and targets have been removed from the final Strategy.
200300358: F. Schnattler	Sec. 3.8, pg. 1	Some of the contents I would like to find on the SEENergy or BEvolution website: 1. How many are born daily? (total, female, male, regions) 2. How many die daily? (total, female, male, age, cause of death, occupation, regions) 3. Inhabitants of Western Australia (total, female, male, age, regions) 4. Air pollution information (regions) 5. Energy consumed daily [kWh or MWh] (total, regions) 6. Water power installed [kW or MW] 7. Wind power installed [kW or MW] 8. Solar cell power installed [kW or MW] 9. Grid-connected solar cell power installed [kW or MW] 10. Solar collector power installed [kW or MW] 11. Water tank capacity installed [ML or GL] Water consumed daily [ML], etc.	Noted.

Recognising Sustainability Excellence

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	23	The creation of an Annual Sustainability Award to recognise significant achievement in sustainability (Action 1.30) is supported as an initiative to promote best practice in this area.	Noted.
200300368: City of Kalgoorlie- Boulder	11	The Annual Sustainability Award is seen as positive.	Noted.
200302880: City of Wanneroo	26	Action 1.30 - Annual sustainability awards are an excellent idea. As there are many different facets that go towards creating sustainability it is suggested that several awards should be granted, with each focusing on one of the identified visions rather than one general award.	Noted.
	27	A possible key performance indicator for overall assessment of progress towards sustainability could be the use of ecological footprint analysis, both per capita and total.	Noted.
200303065: City of Gosnells	29	It is considered preferable for recognition initiatives to be integrated into existing awards schemes rather than creating new ones.	Noted.
200300367: Clive Malcolm	4	I see one of the barriers to progress being the general feeling of people that they cannot make a difference. I suggest that a way to give people the feeling that they are making a contribution is to establish a sustainable communities project. Under this project, within a community persons and organisations would be able to 'register' contributions they are making towards the sustainability of their community....There would need to be a way of enabling the community to see that their combined efforts were making a difference. Perhaps this could be done through local government....Perhaps there could be an incentive	Noted.
200302729: Shire of Serpentine- Jarrahdale	2, pg. 9	Ensure the awards are across all industries, include all levels of education and all ages. There needs to be more than one award it needs to be a range of awards across different areas.	Noted.
200300358: F. Schnattler	Sec. 3.9, pg. 1	Broadcast Award ceremony on TV Channel 31.	Noted.

