

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

## **Section Nine - Implementation**

<b>CIB #</b>	<b>Submission paragraph/ page #</b>	<b>Paragraph Text</b>	<b>Response</b>
200302961: South West Development Commission	6	The development of regional sustainability strategies is obviously an action of significant interest to the Commission. The role to be played by the commissions, local governments and others will require clarification once the strategy has been endorsed by Government, as it is not clearly specified in the draft document. The Commission would also expect that such regional strategies would involve more than 'sense of place' stories.	The final Strategy emphasises the importance of developing a methodology for Regional Sustainability Strategies prior to their implementation. This will be done in conjunction with the Western Australian Planning Commission and other stakeholders.
200302855: Planning Institute of Australia	14	The Strategy has moved away from broad based motherhood statements and included a very comprehensive list of priority areas and actions. The Strategy does not address the resourcing implications of such recommendations and an Implementation section which prioritises actions and identifies financial and funding sources for such actions should be an integral part of the document.	The final Strategy identifies responsible government agencies for each of the actions within the Strategy. Agencies will prioritise the actions for which they are responsible during the course of normal activity over the next 5 – 10 years. These could be further developed through the Sustainability Action Plans that will be prepared by each agency in response to the Sustainability Code of Practice for Government Agencies. It is anticipated that many of the actions will begin immediately.
200302850: City of Mandurah	27	The Strategy does not address the issues of funding, cost sharing or the timetable for implementation.	See above.

## **IMPLEMENTATION**

## Implementation *continued*

200305753: Department of Planning and Infrastructure	29	It is important that the scope of the sustainability concept is retained so that it is clear that sustainability is not an 'add-on'. However it is suggested that the final Strategy focus on some key or priority areas, strategies, goals and actions as a way of focussing and mobilising implementation energies of Government agencies, industry and the community.	Noted.
200301547: City of Cockburn	3	The trend in recent years to apply more 'fiscal restraint' in State Government spending has seen a reduction in extent and / or quality of services from many Departments. Implementation of many of these Proposed Actions will require additional up front funding to be effective and should not be at the cost of existing services. Actions will require a defined agency or body with responsibility for implementation to ensure that it occurs. The Government's commitment to sustainability will be judged by the actions that result from the Sustainability Strategy.	Actions will be implemented within existing budgets. The Sustainability Policy Unit will be responsible for overseeing the implementation of the Strategy.
200303139: Kimberley Development Commission	4	The proposed actions that have been identified within the draft strategy could have the potential to value add to current activities however they will require the identification of responsible agencies, resources and timeframes for their implementation.	See above.
200300348: City of Bunbury	56	For sustainability to be achieved both the state and federal government will need to incorporate principles through policies and legislation for it to be adopted. Without such an overarching support framework, the principles of sustainability will continue to be adopted in various degrees and levels of success.	Noted.
	57	Government, through both the commonwealth and the state will need to provide various assistance through education, reforms and incentives for local governments to be able to appropriately adopt such principles. The ability of local government authorities to adopt and implement such principles will depend on the resources that are available, and as is the case with many smaller authorities, such resources, including staff technical advice is unavailable.	Noted.
	58	The current government was elected with a strong emphasis on its commitments to produce a sustainability strategy, which crosses all levels of government and community. It is the City's understanding that the Sustainable Policy Unit has 1 to 2 staff members on a contract basis for the development of the strategy- what happens after the strategy has been complete? It is not clear at present who will deliver, promote and provide the necessary framework for the strategy to be successfully adopted.	The Sustainability Policy Unit will continue to operate within the Department of the Premier and Cabinet to implement a number of the actions within the Strategy and to ensure overall coordination for this initiative.

## IMPLEMENTATION

## Implementation *continued*

200300348: City of Bunbury	59	The dissemination of information about sustainability principles and how they can be achieved will be of vital importance to the adoption and understanding of the strategy. Appropriate resources need to be assigned by the government to maintain the current momentum and progress of the many objectives and proposed actions outlined in the strategy.	Noted.
200219471: Town of Cambridge	17	As overarching State Policy, the ENR, Coastal and PWDS Policies tend to express broad principles. Further, they form part of a suite of 'sector issues' that must be considered in planning, from a regional point of view. As mentioned earlier in this report, much will depend on how the state implements these policies, in balancing economic and social concerns with sustainable environmental management.	Noted.
	18	Of particular concern to local government is that decision making at the state level is accountable and expeditious. As one of the measures in the ENR Policy, 'best available data', is vitally important to informed and expedient decision making. Decisions based on general philosophy, or subservient to particular interests, will inevitably lead to adversarial situations and will 'bog down' the approvals process and continued involvement and commitment at the State Government level to assist Local Government in the management of the Coast.	Noted
	20	In the application of these policies, as indeed with all State Planning Policies, there must be a genuine commitment by the State to engage with Local Government and the general community, and not merely enforce particular planning theory, from a distance.	Noted
200302856 City of Stirling	47	The draft Strategy relies heavily on the statutory town planning system to facilitate the introduction of sustainability principles and initiatives. However, it does not make adequate reference on the resources, skills and capacity that may be required by some local authorities to implement these sustainability principles through the statutory planning system. There is a real opportunity for the State Government to share information and build capacity, in order to gain optimum efficiency throughout local government. Greater recognition of the importance of state policy on local planning should also be provided, particularly in view of the reluctance of the development and building industries to support any initiative which increases their costs, and the difficulties this presents to local governments seeking to implement such initiatives without state backing.	This has been addressed in the final Strategy. See <i>Sustainability and planning</i> .

## IMPLEMENTATION

## Implementation *continued*

200302856: City of Stirling	49	There needs to be clear direction to local government by the State Government as to what is required to implement consistent, across the board sustainability initiatives within their local communities, and a common sustainability framework. There appears to be a reluctance for local authorities to enter into a sustainability programs where there is no standard framework, confusion over the aims of such programs and unpredicted outcomes.	The development of the Sustainability Scorecard should go some way to addressing this issue. See <i>Sustainability and planning</i> .
200300362: Wildflower Society of WA Inc.	30	We regret that we have to report that we found the draft strategy difficult to read, poorly written, with grammatical errors and it was poorly edited. Our main concern is the current lack of the resourcing of agencies required to implement and monitor the strategies outlined in this document. It is very hard to be optimistic about the future of Western Australia's biodiversity without Government commitment to maintaining these essential capacities. However, we look forward to improvements in the final version of "The Western Australian State Sustainability Strategy".	Noted.
200300140: Wetlands Conservation Society	3	The Implementation Plan is not clear. Although the Strategy contains many useful goals and proposed actions they will not be implemented unless a clear and detailed implementation plan is developed. For example the most recent WA State of the Environment Report (1998) covered many similar issues to this draft strategy but no implementation plan was put in place and so most of their recommendations have not been followed through. A similar fate befell the 1992 WA State of the Environment Report. We recommend that you follow the process adopted for the Perth Air Quality Management Plan for which the strategy was followed by an Implementation Plan which assigned target dates and responsible agencies and set up an audit and review process for the Plan. A lot more work needs to be done on Chapter 9 if this Strategy is to be effective.	Noted.
	4	There is a lack of target dates and measures of success (or failure) for most of the proposed Actions. Each one of these Actions needs to have a set of measures or performance indicators and target dates associated with it as in the Implementation plan for the Perth AQMP.	Noted.
	5	The auditing process for the Implementation Plan needs to be carefully specified. We would like to see a State Sustainability Council established, containing a wide range of community expertise. The Council would be serviced by the Premier's Department and its job would be to monitor the implementation and updating of the Sustainability Strategy and to publish an annual report of its findings. This will obviously have resource implications but unless these resources are provided the Strategy is unlikely to be successful.	This is addressed in the final Strategy with the establishment of the Sustainability Roundtable. One of the tasks of the Roundtable is to oversee the implementation of the State Sustainability Strategy.

## IMPLEMENTATION

**Implementation** *continued*

200303065: City of Gosnells	6	The attention to detail in the area of implementation is inconsistent. In some areas the proposed actions are very specific, whereas others seem yet to be developed. This makes it difficult to clearly understand the role that the Strategy is intended to fulfil. To ensure that the Strategy provides a useful tool to aid in the development of a sustainability framework across the State, it is considered that the area of implementation needs to be expanded.	Noted.
200300298: Information for Action	10	The environment has been given a low priority in the legislative reform agenda. Most preelection commitments to environmental legislation such as Environmental Protection Act amendments, a Waste Management Act, a Contaminated Sites Act and a Biodiversity Conservation Act are yet to be delivered.	Noted.
	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.	Noted.
		In summary I would like to stress that fine words and good intentions are not enough to end and reverse the rapid environmental decline that we are experiencing. We need stronger leadership, we need legislative action and we need it now. The time frame proposed for implementing policy change will mean going backwards for another five or ten years. There will be opposition from business groups and others who perceive (rightly or wrongly) that they have more to lose than to gain from policies that work towards sustainability. Workers will need help in training for and adjusting to new types of employment. The Government will need the strength of character to keep focused. Although words are important, future generations will not judge you by your words.	Noted.

## IMPLEMENTATION

## Implementation *continued*

200300306: WA Bicycle Committee	16	Lastly, some reference to the costs of and mechanisms to implement the final Strategy would be useful. The Committee was concerned that Government will expect organisations to “absorb” the costs of initiatives within already very tight budget allocations. This may prove very difficult for some agencies and could significantly and negatively affect the implementation of the final Strategy.	Noted.
200219280: City of Swan	63	The strategy should be commended for the proposed actions as they are proactive focussing on training, education, information provision, as opposed to more regulatory and control mechanisms which is how change in business practices has been directed in the past. However, some of the proposed actions are relatively high level with out a clear indication of how they will translate into practical applications for businesses. This issue needs to be addressed as part of the Implementation Program when it is developed.	Noted.
	64	Similarly, the strategy indicates that a State-Local partnership will be developed and responsibilities for implementation specified in the Implementation Program. Will the roles be clarified in consultation with Local Government or will the report dictate responsibilities to LGA’s?	The State Local Government Sustainability Partnership Agreement will be developed in consultation with Local Governments.
	65	Also the Strategy identifies the use of Local Government statutory planning mechanisms, in conjunction with State processes, as a tool for implementing sustainability. If Local Governments are to regulate businesses as part of their statutory planning processes will adequate resources be provided to ensure this takes place in an effective manner?	Noted.
	66	More effort is required to formalise partnerships and the principles of sustainability into the statutory process, as well as reviewing legislation holistically to achieve social, environment and economic integration.	This is addressed in the final Strategy. <i>See Sustainability and planning.</i>
	67	More effort required addressing issues via statements of planning policy, other statutory mechanisms or local government plans. (see page 211), given its suggested role as a key mechanisms for implementation.	Noted.
	68	Support the idea of maintaining and creating sustainability units in state and local government. Also support an ongoing role for the sustainability Policy Unit, backed by legislation.	Noted.

## IMPLEMENTATION

**Implementation** *continued*

200300357: Water Corp	55	On page 209, the Strategy states that Government agencies will develop a Sustainability Code of Practice (and associated Sustainability Action Plans) and Sustainable Procurement Policy. The Water Corporation has already committed to a sustainable operations policy, which is reflected in its Strategic Framework and Environmental Policy.	Noted.
200300261: City of Albany	17	One of the major weaknesses of the Strategy is the apparent lack of reference to resourcing (both of local and state government) to deal with the implementation of sustainability at a local level. The requirements of sustainability assessment along with changing practices and increased training needs will be a significant cost that may not be easily borne by many local authorities.	See above.
200300368: City of Kalgoorlie- Boulder	60-66	<ul style="list-style-type: none"><li>▪ The development of regions needs to be considered carefully to ensure maximum synergies between the communities and industries involved and the existing regions.</li><li>▪ The three tiers of government have to approach sustainability together to ensure that maximum acceptance is achieved in the shortest time frame.</li><li>▪ Community drivers for sustainability will ensure its success, imposition from a state government organisation will create conflict and antagonism rather than sharing and acceptance.</li><li>▪ Triple bottom line accounting needs to be included in all government operations with a strong emphasis on the social and environmental issues.</li><li>▪ Milestones need to be set by local communities in order to assist the communities to determining what support is required to build sufficient capacity within the community to fully support sustainability.</li><li>▪ Industry must be encouraged to assist communities in the building of social capital, as this is the basis of their workforce and thus their long-term survival.</li><li>▪ Implementation will rely heavily on local government through the Statements of Planning Policy. Need legislative power to enforce provisions through appropriate penalties (ie fines). State Sustainability Strategy should integrate with regional and local planning strategies.</li></ul>	Noted.

### Implementation *continued*

200217558: Stuart Hawkins	6	The lengthy list of proposed actions may set up the State Government for significant failure, whereby the Government will be held accountable for not implementing some of the many proposed actions. Consideration should be given to refining list of proposed actions, or alternatively, clearly identify the agencies/groups which have agreed to implement the strategies on behalf of the State government, thereby transferring the responsibility.	The final Strategy addresses this. Responsible agencies have been allocated to each action.
	7	The Consultation Draft not state how the implement action of the proposed actions will be monitored, thereby not providing for accountable and transparent implementation. I recommend that reporting on the implantation of the proposed actions be listed sequentially in an implantation status report not exceeding five (5) years from the final release. The implantation status report should also state actions required to improve implantation.	The final Strategy indicates that the Sustainability Policy Unit will prepare a State of Sustainability Report which reports on progress with implementing the Strategy.
200215065: Graham Chittleborough	6	A second major failing of the Draft Strategy, is the absence (in most cases) of specific targets and time frames for their achievement.	This will be addressed by responsible agencies.
200303162: R. Chapple & G. Watson, MLC's	2, p. 5	Too many (unfunded) carrots and not enough sticks. Reliance on 'voluntary' schemes is failing elsewhere in the world, and 'command and control' regulation can not be so lightly dismissed.	Noted.
	2, p. 5	There is no indication of commitment of Government resources, in fact there seems to be a reliance on seeking Commonwealth funds alone for some actions.	Noted.
	2, p. 5	Little on social impact, lack of principles of wealth equality. There is virtually nothing on reducing consumption/reducing our footprint.	There is more fully addressed in the final Strategy.
	2, p. 5	Bioprospecting – not addressed	This is more fully addressed in the final Strategy.
200300359: Bernhard Bischoff	6	What are the chances that we learn to consider the long term effects before we act? <b>The enormous problems with obesity among young Australians do not augur well for the future. Over indulging with food and sweet drinks appears to be symptomatic for a worsening attitude. We can only hope that the bad effects these people experience on them selves might teach them that short term thinking – or not thinking - can lead to long-term suffering.</b>	Noted.

### IMPLEMENTATION



200303353: Jael Johnson	2, p. 2	<p><b>The SSS must address the need for a shift in cultural and social paradigms on international as well as local levels that are supported and furthered by all levels of governance and society.</b></p> <p>I recognise that this document is an attempt to address some of these global problems but herein lies one of what I see as the biggest potential danger of this document. Will it, and the strategies it wants to encourage, really lead to different courses of action or will the document provide further justification for 'business as usual' but with a sustainable rubber stamp alongside all the others.</p>	Noted.
200303069: Australian Petroleum Production and Exploration Association (APPEA)	9, par. 3-6	<p>Perhaps the most important point in the following notes is the strong recommendation that the Government involve key stakeholders, including industry, in the implementation process.</p> <p>We recommend the priority for developing the sustainable development strategy at this early stage is entirely focused on the sustainable development principles for W.A. The Strategy's 'proposed actions' and all other attendant material should be set aside until:</p> <ul style="list-style-type: none"> <li>▪ an appropriate use of terminology and the globally accepted sustainable development definition is adopted; and</li> <li>▪ sustainable development principles are developed that can support an appropriate sustainable development definition and policy.</li> </ul> <p>The effectiveness of the Strategy will depend on the ability of business and community groups to put the agreed principles into practice. To have practical workable systems, the Government will have to go well beyond the standard call for submissions. We recommend business and other interest groups should be involved directly in the development of structures and systems to implement the sustainable development objectives.</p> <p>APPEA would welcome the opportunity for continuing involvement in the development and implementation of the Strategy. Specifically, we seek participation in the following key activities:</p> <ol style="list-style-type: none"> <li>1. any working group that defines the sustainable development assessment criteria and methodology for major projects;</li> <li>2. any working group that develops the W.A. coastal and marine planning strategy; and</li> <li>3. any taskforce examining oil vulnerability, gas transition and the hydrogen economy.</li> </ol>	The Government will establish a sustainability roundtable with community and industry involvement to contribute advice to government on progressing partnership initiatives within the final Strategy.

## IMPLEMENTATION

## Implementation *continued*

200303088: Australian Association of Planning Consultants (AAPC)	3, par 4	This section of the document needs to be expanded considerably. The document states that a "detailed Implementation Program" will be developed following the finalisation of the Strategy and that finalisation of the Strategy will occur through a program of consultation and partnerships with key stakeholders...	Noted.
	4, par 1	It is not clear how the land development industry and planning professionals are included in the process other than the possibility of representation on the Sustainability Assessment Working Group. If it is intended that statutory planning processes be widely used for implementation of the Strategy then it is critically important that planning professionals and practitioners working in the private sector as well as those in Local and State Government agencies be acknowledged as key stakeholders and their contribution and participation in the process of implementing a wide range of proposed actions be sought.	The Government will ensure that there is ongoing dialogue with key stakeholders in the development of relevant initiatives within the final Strategy.
	4, par 2	Each of the key Actions need to be evaluated, prioritised, properly resourced and allocated to a specific agency or organization for implementation and be subject to on-going monitoring and review to ensure that the intended outcomes are achieved. -Evaluate and prioritise all proposed action -Compile a realistic & effective implementation programme -Expand the range of implementation mechanisms	Noted.
200302957: BHP Billiton	9	Consider implementing the strategy through the proposed partnership process with key sectors in two phases, the first to determine principles, policies and governance in each sector and the second to consider "action" recommendations after they have been prioritised and evaluated.	The final Strategy is very supportive of the need to develop partnerships in support of key initiatives.
200218007: Bunbury Port Authority	1	The strategy identifies a large number of actions, which I understand are not in priority order. It is our view that it is critical for these actions to be prioritised into those that can be undertaken now and those that can be timetabled into the future. Strategies that can be actioned immediately should proceed as these will provide a good basis for demonstrating the progress that has been made.	Noted.

## IMPLEMENTATION

## Implementation *continued*

200218007: Bunbury Port Authority	6	It is important that once the sustainability strategy is implemented that it is progressed in a manner, which does not add another layer of approvals in the process, which is already time consuming and cumbersome. As evidenced in the Keating review, the sustainability strategy must be efficient and effective and enhance existing processes and procedures.	Noted.
200303264: Anthony Perl	5	Now that Western Australia has such a promising sustainable development strategy, people need a way to invest in it easily. One such way would be for the Western Australia government to launch a sustainability savings bond program. Funds invested in these bonds would receive a guaranteed return that was comparable to other public borrowing, perhaps with some incentive such as tax-free interest. The capital raised by these bonds would be invested in ventures that met sustainability covenants and showed commercial promise. Another option would be to invest a share of public sector pension funds in ventures that are certified to meet sustainability goals as set out in the official plan. In either or both cases, the flow of resources can accelerate private sector pursuit of sustainable development goals and targets in Western Australia.	The final Strategy considers the possibility of investing public sector superannuation funds in sustainable investments. See <i>Financial reform and economy policy for sustainability</i> .
200303048: Conservation Commission of WA	1, p.15	The Commission recommends that the Final Sustainability Strategy be structured so that it comments on, and directly critiques, significant aspects of public submissions. It is suggested that the Keating Review is a good model in this regard.	Noted.
200304379: DEWCP	1, par 7	There should be a clearly stated process to develop this document through community and agency involvement. Because the document would get out of date after a few years, a review process also needs to be agreed upon and made public in the document	The final Strategy was developed with significant input from public and agency submissions. The final Strategy indicates that it will be reviewed every two years.
200300363: Ecotech Architects	Page 2, para 5	To ensure ongoing success, the chain of action needs to be monitored and reviewed regularly. The transition of policy, to endorsement, to practice, implementation, post completion evaluation, and back to policy reassessment and modification where necessary, is an important feature to incorporate, in the government system of implementing this strategy. In fact, the reassessment process should be denoted as part of the final strategy document as it evolves into policy.	The final Strategy indicates that it will be reviewed on an ongoing basis to ensure its effectiveness.

**Implementation** *continued*

200300363: Ecotech Architects	Page 3, para 1	The support for public, professional education and training needs greater resources and attention, to deliver the outcomes that are desired and expressed in the strategy document. This needs to be a high priority of investigation, early in the process. It probably needs integration into the final document over the next 6 to 12 months. From a legal sense, facility for this evolving policy function must be integrated into the Parliamentary endorsed document when this occurs.	Noted.
200304162: Environmental Protection Authority (EPA)	Page 3, para 1	The draft strategy suggests that a section of the Sustainability Development Unit might be located within the EPA Service Unit. Given that some of the EPA Service Unit's roles are SOE reporting, NRM auditing, environmental policy development and EIA, such an initiative has merit.	Noted.
200303425: Fire and Emergency Services Authority of WA	2, pg. 5	It is also agreed that the concept of sustainability will be difficult to implement. The strategy may benefit from including a section, which defines significant factors that influence implementation.	Noted.
	3, pg. 5	More specific attention on the institutional, procedural and communicative aspects of sustainability appears warranted. In a particular, the following need to be addressed: <ul style="list-style-type: none"> <li>• Harnessing non-expert/indigenous knowledge and including this input decision making;</li> <li>• Portraying and communicating sustainability concepts in easily understood terms;</li> <li>• Ensuring Western Australians can assume practical roles at local community</li> </ul>	The final Strategy provides additional support for this intention.

## Implementation *continued*

200303312: Department of Conservation and Land Management (CALM)	Page 3	<p>The draft State Sustainability Strategy lacks a clear implementation framework that indicates the timeframe, resources, responsible agencies and priorities for the actions that are proposed. Below is a discussion of how the implementation framework could be improved.</p> <p><u>Proposed Actions</u></p> <p>It is fundamental that the State Sustainability Strategy maintains consistency between objectives, proposed actions and indicators/targets. For instance, there are inconsistencies in this regard for the priority area <i>Maintaining our Biodiversity</i>. The second objective aims to protect biodiversity through reservation and off-reserve management, however, there are no actions identified to achieve this objective. This occurs throughout the document. It is highly recommended that the "In short..." sections in the draft document be reviewed for the final Strategy, so that the objectives relate directly to the proposed actions and targets/priorities, therefore ensuring that consistency is maintained.</p> <p>It would be useful if, following consultation and agreement with Ministers and agencies, the final Strategy indicated the agency/organisation/institution responsible for carrying out the proposed actions for each priority area. This will not only inform agencies of their responsibilities under the Strategy, but also indicate to the community the roles of different agencies in implementing the Strategy.</p> <p><b><i>Indicators and targets</i></b></p> <p>The draft State Sustainability Strategy identifies a number of indicators and targets for each priority area. It is important to note that indicators and targets are different measures, and it should be identified in the Strategy whether a component will be measured against a target or an indicator. A second point to note is that both indicators and targets are <i>measurable</i> or <i>quantifiable</i> factors. The draft Strategy does not provide clearly quantifiable indicators or targets. Existing indicators/targets need to be reviewed and re-worded so that they can be measured, in order to assist in evaluating the success of the implementation of the Strategy. A general timeframe should also be developed for achieving the targets of each priority area. This will assist in avoiding any unreasonable expectations from the community with regard to the timeliness of outcomes of the Strategy.</p>	The final Strategy nominates responsible agencies for each of the actions. All reference to indicators and targets have been removed and these could be further developed at a later date.
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## Implementation *continued*

CALM (cont'd)		The current targets/indicators in the draft Strategy are generally very broad, and focus on <i>processes</i> rather than <i>outcomes</i> for sustainability. For example, one indicator for the priority area <i>Sustainable Fisheries and Aquaculture</i> is "number of fisheries that have successfully undergone sustainability assessments" (page 107), which focuses on the process of sustainability assessment, rather than the outcomes of the assessment. The usefulness of the indicators throughout the Strategy would be enhanced by providing <i>outcome</i> -based indicators and targets that are quantifiable. For the same section, suggested indicators are "no net loss of finfish diversity as a result of human activity" and "no reduction in protected finfish species abundance as a result of human activity". Similarly, the Strategy identifies the other indicator for this priority area as the "area of reserves for the conservation of marine biodiversity in each marine bioregion". This would be enhanced by adding an outcome-based target such as "no loss of species diversity and abundance within marine conservation reserves as a result of human activity within these reserves".	
200303074: WA Sustainable Industry Group (WASIG)	3, p.7	The Draft Strategy's ability to deliver on these sustainability visions is hampered by the absence of implementation mechanisms at the system's level of the strategy (in particular for monitoring and accountability; prioritisation, planning and decision making; financial resources mobilisation and allocation). Such implementation mechanisms are scarce throughout the Draft State Sustainability Strategy, and those included only related to individual actions not the management of the strategy in its entirety. The output (or activity) focus in the thematic discussions of each of the sustainability visions, with supporting goal and priority areas for action (chapters 3 to 8), further detracts from a strategic approach, leading to insular long-lists of relatively unconnected priority areas for action within each sustainability vision.	The final Strategy allocates responsibility for individual actions for implementation. The implementation of these agencies will be done within existing resources and agencies will be responsible for determining their priority. This will be recorded through the Sustainability Action Plan. The Sustainability Policy Unit retains a coordinating function within government to ensure the implementation of this initiative over time and in consultation with the Sustainability Roundtable.
	2, p.8	A systems approach to managing the sustainability strategy is desirable (as visualised in Figure 1). The system should encourage and facilitate the building of consensus in the WA society about visions, goals and tangible objectives for sustainable development.	Noted.

## IMPLEMENTATION

**Implementation** *continued*

200303074: WASIG	1, p.9	In addition to interpreting sustainable development strategy as an adaptive management system, the OECD stresses the need for policy coherence and integration. All areas of government policy need to act in concert to catalyse the delivery of sustainable development outcomes. It has provided a checklist for such ensuring such policy coherence and integration – it is recommended that this checklist be considered in finalising the State Sustainability Strategy. An overview is given in Table 2.	Noted.
	2, p.21	The WA SIG would like to see 'Factor 4' become one of the few leading themes in the final State Sustainability Strategy (and subsequent action plans). There are a number of benefits for using Factor 4 as a strategic objective across the State Sustainability Strategy, rather than just in one of the priority areas for action. See document for details	The final Strategy commits to the development of a Factor Four Program in consultation with WASIG and other stakeholders.
	1, p.24	As highlighted throughout this submission, the WA SIG is deeply concerned about the ability of the WA Government and the public, private and civil sectors to effectively manage the great diversity of 249 'priority' areas for action. The WA SIG therefore recommends that a strategic process be established that allows for ongoing review and prioritisation of sustainability action areas to effectively only pursue a few (perhaps no more than half a dozen) high impact action areas at any one time. Other action areas can then be pursued as part of other strategies (e.g. greenhouse strategy, water strategy, housing strategy, etc.). The State Government could then commit to a significant initiative in each of the time-bound priority impact areas allowing inroads to be made in dealing with selected elements of the State Sustainability's Agenda (rather than spreading too thin across all elements of the State Sustainability's Agenda).	See previous comments for implementation arrangements in final Strategy.

## Implementation *continued*

200303074: WASIG	2,3 p.24	<p>The WA SIG would recommend the following criteria for this ongoing strategic review and prioritisation process for high impact priority action areas. At any time the current high impact priority action areas should:</p> <ul style="list-style-type: none"> <li>▪ Have outstanding potential for simultaneous net environmental, social and economic benefit</li> <li>▪ Build upon and extend beyond activities already planned or being implemented by other stakeholders (e.g. local agenda 21, sustainability codes of conduct for various industry sectors)</li> <li>▪ Not replicate actions already being pursued through other sectoral strategies (such as water strategy, greenhouse strategy, housing strategy, etc)</li> </ul> <p>The WA SIG would recommend that at least the following initiatives are included as high impact priority actions in the final State Sustainability Strategy: Factor 4 Program: Sustainable Lifestyle Initiative: <b>Global Sustainable Livelihoods Initiative:</b> See document for details</p>	Noted. A factor four program is included as is the investigation of a sustainable living program.
200303073: Natural Resource Management Council	Point 4	The Strategy appears to have a focus on statutory means of ensuring compliance or enforcing sustainability. This aspect is certainly needed, but the other mechanisms of persuasion, education, incentives and self-regulation need to be pursued also. As a State Strategy, it would be wise to engage the community in implementation and mention their important role in the document. Sustainability is for everyone, and all need to be acknowledged, engaged and involved.	This has been further addressed in the final Strategy.
	Point 6	Further to the above paragraph, where resources are required for an action, these should be identified and sought. Proposed actions without resources generally lead to nothing. NRM Council, and members involved in the previous Salinity Council, are conscious that an excellent strategy or plan is worthless unless there is commitment and resources to enable action to occur. Council recommends some strategy on resourcing actions be included in the Sustainability Strategy.	Noted.
	Point 13	Several sections in the Strategy seem to need a State Strategy to provide a framework for the random actions listed in the section or actions omitted from the section....Ideally, there should be a framework within which the specific actions have been reviewed and prioritised. NRM Council and agencies, including CALM, are working on methodologies to prioritise assets for investment now.	Noted.

## IMPLEMENTATION



**Implementation** *continued*

200303443: State Development Portfolio	210	<p>It is considered that the following issues/tasks also need to be incorporated into the implementation program:</p> <p><b>Overarching vision – to guide the process for adoption of the Strategy principles and actions by government agencies,</b></p> <p>Audit/Gap Analysis – to highlight the areas where the greatest changes will be required,</p> <p>Community engagement – outlining proposed actions/strategies to bring the broader community “up to speed” with the concepts and proposals outlined in the Strategy,</p> <p>Education and marketing strategies – to increase public awareness and understanding of the issues, concepts and actions as proposed in the Strategy,</p> <p>Legislative and institutional reforms – guidance on the procedures/mechanism to be adopted to allow the necessary legislative and institutional changes to be developed and adopted.</p>	The final Strategy addresses these matters.
200303149: Swan River Trust	2, p.5	Along with setting measurable targets an important step in ensuring implementation will be in identifying roles and responsibilities for carrying out the actions.	This has been addressed in the final Strategy.

## Implementation *continued*

200217953: The Market Place Company	p.9	<p>On Page 201 of the Strategy, Sylvia Tetlow is quoted “We need to put a true monetary value on our enjoyment and use of our natural environment and biodiversity”. What she has effectively stated here is that there needs to be an accurate price signal that reflects the sustainable value of the environment. This estimation is best achieved through the use of marketbased instruments that lead to transparent price discovery and efficient resource allocation. In its mixture of tools, the Strategy includes economic analyses that estimate the impacts of activities on environmental and social amenities. It identifies the problem that no market exists for the amenities, rendering subjective the value that is placed on their loss.</p> <p><b>This approach is consistent with a taxation-based regime, where a central agency is responsible for evaluating investment decisions, and raises consequent issues of sub-optimal resource allocation.</b></p> <p><i>Recommended solution:</i></p> <ul style="list-style-type: none"> <li>· Create a property right for sustainable waste treatment;</li> <li>· Create a mechanism for its exchange,</li> <li>· Set a price for non-compliance by liable parties that is higher than the price to supply sustainable waste treatment.</li> </ul> <p>The result would be discovery (by normal market dynamics) of the most efficient price to supply the desired amount of sustainable waste treatment. Such price discovery enables the most efficient allocation of resources to achieve the desired outcomes.</p>	This could be considered as part of the finalisation of the State Government’s Waste Management Strategic Framework.
200303590: WA Collaboration	Rec. 29	<p><b>State Government’s role in implementing sustainability</b></p> <p>All State Government agencies should be required to establish:</p> <ol style="list-style-type: none"> <li>1. sustainability policies and objectives that are consistent with an agreed sustainability framework, and</li> <li>2. sustainability indicators to measure progress in implementing these policies and achieving the objectives.</li> </ol> <p>Departments and agencies should be required to report annually to the Sustainability Commission and to State Parliament on their progress. The Sustainability Commission would then audit the agencies’ annual sustainability reports, and the performance of the agencies against their own policies and objectives.</p>	The final Strategy requires Government agencies to respond to a Sustainability Code of Practice through the development of a Sustainability Action Plan. This will enable individual agencies to demonstrate how they are responding to sustainability and how they are ensuring their policies and objectives are consistent with the sustainability framework.

## IMPLEMENTATION

## Implementation *continued*

200305584: WA Local Government Association (WALGA)	6-8, p.4	<p>A clear direction needs to be set as to the integration of sustainability legislative and policy actions between portfolios, particularly regarding those issues over which disputes arise. There has traditionally been limited practical interaction and coordinated legislative planning between many government agencies. MWAC believes that this must be addressed to ensure the successful implementation of any sustainability Strategy.</p> <p>MWAC believes that an independent panel or citizens jury should be involved in these cases, particularly in situations of entrenched interdepartmental difference of opinion.</p> <p>A recent survey of Local Government (waste management) Officers highlighted a fundamental confusion and uncertainty about sustainability in general and the practical implementation of the Strategy specifically. Detailed information in the form of seminars, training, information kits, and implementation manuals was felt to be essential for the successful implementation of the Strategy. Sustainability indicators and baseline measures for assessment of change are insufficiently addressed in the Strategy and were considered to be essential for implementation. MWAC recommend immediate research into the development of indicators and baseline measures.</p>	<p>Noted.</p> <p>The final Strategy indicates that headline sustainability indicators will be developed and reported on regularly.</p>
200303494: WA Planning Commission	3.13	<p>Box 44 on page 212 sets out the existing and proposed strategies and actions many of which involve the Commission. <i>In terms of land use and development it would be unfortunate if a separate administrative structure were to be established without regard for that which already exists without good cause. More attention should be paid to how best to utilise and build on the current planning mechanisms before committing to a new, and parallel system.</i></p>	<p>The final Strategy gives increased attention to the role of the Western Australian Planning Commission in implementing sustainability initiatives.</p>
200219116: Wheatbelt Development Commission	10	<p>The Commission considers that the strategies highlighted are too generic. The Commission is already working to achieve a number of these actions. The policy does not address the constraints towards achieving these actions (i.e. assistance with how many to tackle the problem, funding solutions etc.) Furthermore, many of the indicators and targets are too vague and too easily attainable. The Commission questions how many of these initiatives are going to be funded. This documents clearly outlines many of the issues without any substantial answers.</p>	<p>Noted.</p>

## IMPLEMENTATION

### Implementation *continued*

200303090: Woodside Energy	5, p.5	Woodside believes it is imperative that the Government involve key stakeholders, including industry, in the implementation process. The effectiveness of the strategy will depend on the ability of business and community groups to put the principles into practice. To develop practical, workable systems business and other interest groups should be involved directly in the development of structures and systems to implement the sustainability objectives.	The final Strategy clearly indicates that the Government will involve relevant stakeholders in the implementation of the final Strategy.
	p.9	THE IMPLEMENTATION MODEL: In considering a workable model for sustainability, petroleum producers recognise that the formula should be applicable to other business and community interest groups. Using the framework outlined in the draft strategy, four essential factors emerge in developing sustainable operations. Co-operative management, Public involvement, Transparency, Verification <b>See document for details of the model.</b>	
	p.10	EFFECTIVE IMPLEMENTATION: The oil and gas sector can contribute to the implementation of the draft strategy, with an initial focus on two key areas identified in the draft strategy: <ul style="list-style-type: none"> <li>• Sustainability covenants</li> <li>• Sustainability assessments</li> </ul> <b>See document for details</b>	Noted. The final Strategy indicates that industry and other stakeholders will be further involved in these and other initiatives.

**Implementation** *continued*

200303090: Woodside Energy	p.13	<p>The basis for effective industry-generated sustainability programs is a set of agreed commitments that identify the goals and requirements for success. Effective programs developed during the past decade have been built on a number of common principles, including:</p> <p><b>Accountability Consultation</b> – involving communities in planning and production</p> <p><b>Communication</b> – to establish trust and transparency</p> <p><b>Environmental management</b> – including the priorities of conservation and biodiversity protection</p> <p><b>Risk management</b> – of environmental, safety, social and economic factors</p> <p><b>Continuous improvement</b> – based on unit production and clearly identified performance objectives</p> <p><b>Product stewardship</b> – as part of the corporate responsibility for upstream and downstream activities</p> <p><b>Social responsibility</b> – generating sustainable community benefits</p> <p><b>Viability</b> – the foundation stone for any kind of sustainability</p>	Noted.
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# **Implementation** *continued*

200303090: Woodside Energy	P.13	<p><b>Development of an implementation model</b></p> <p>Many of the State's leading resource producers would welcome the opportunity to work with the State Government and community representatives to develop sustainability implementation programs. We would encourage that the next step would be the establishment of a project working group. This group could involve representatives of the Sustainability Policy Unit, the Environmental Protection Authority, Department of Industry and Resources, the conservation movement, APPEA and Western Australian petroleum producers. The group would examine:</p> <ul style="list-style-type: none"> <li>• Successful examples of sustainability in the resources sector</li> <li>• Key issues to be addressed in developing effective new processes</li> <li>• Appropriate levels of flexibility and self-management</li> <li>• Public participation</li> <li>• Safeguards for the community (including reporting and verification)</li> <li>• Government structures and regulatory requirements</li> <li>• An implementation process and timetable</li> </ul> <p>The group would make recommendations to the State Government on an efficient and effective formula for the implementation of sustainability principles to the resources sector. The concepts could be adapted for use in other areas as a blueprint for putting principles into practice. The initiative would make a valuable contribution to the sustainability strategy.</p>	Noted.
200304006: City of Perth	9	The Strategy does not clearly state the need for proposed working groups to establish aims, objectives, terms of reference and time lines. The City feels that this should be done as a matter of priority, as it is essential for creating a framework of implementation for the Strategy.	This will be addressed after the establishment of the various working groups.
	10	It is not clear who will be responsible for reviewing the Strategy. It is also unclear as to how frequently reviews will be carried out.	This is addressed in the final Strategy.

## IMPLEMENTATION