

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

Section One – Introduction Background

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300297: City of Joondalup	32 33 34	It was interesting to note that the focus on measurement of performance vis a vis sustainability immediately highlighted environmental matters. <i>Introduce annual environmental performance reporting requirements for all government agencies in areas such as energy consumption, waste disposal, vehicle fuel efficiency and recycling.</i> Introduction Page 16. Whilst it is appreciated that this statement has been cited from environmental policy documents, it is important that work be done to identify similar performance measures for social and economic aspects of sustainability. There is a perception that sustainability is overwhelmingly focused on matters environmental.	Agreed. The environmental performance reporting requirements are always easier. Some attempt in State Sustainability Strategy to begin to do more on social. Economic already exist.
200302969: Jack Moore	14	I believe the State must dig up its resources regardless of sustainability, to avoid a war of conquest from the resource hungry.	"Digging up resources regardless of Sustainability" will not help global peace.
200303162: Robin Chapple & Giz Watson, MLC's	3, p. 1	The Strategy has a particular emphasis that the achievement of sustainability will be a long one. While we acknowledge there is much work to be done to achieving sustainability in WA and this work will take many decades, there is a danger in not expressing the urgency of establishing a strategy as soon as possible. Comments such as 'these changes will take time' and 'legislative reform to better support sustainability may take many years' can be interpreted as a lack of resolve on behalf of the Government. We suggest that a more realistic acknowledgement of the lack of sustainability in past and current practises in WA and a sense of urgency to correct this should underpin this strategy.	Final Strategy addresses legislative question. Professional and disciplinary changes take time and governments can only encourage this.

Background *continued*

200303162: Robin Chapple & Giz Watson, MLC's	2, p. 5	The document risks degenerating into a series of vague 'motherhood statements' without exposing the deep issues of the current unsustainable lifestyle in WA	The State Sustainability Strategy is a serious assessment of Western Australia's weaknesses and strengths in Sustainability
200300886: Mr. J.E. (Eddy) Wajon	1	I would like to congratulate you and your team on producing a comprehensive, magnificent document. I know it can never be perfect, given the area which it has to cover, and the fact it covers almost every aspect of our lives, but it comes close. I suspect that because its coverage is so broad that each area could not be covered in great detail. This is why I suspect that many of the suggestions and requests I made in my submission did not appear as specific recommendations. I hope that people will read the submissions, but there are so many of them and so much to read that without the "imprimatur" of them being in the "Strategy" they will tend to be forgotten. It would be good to see some of my suggestions so endorsed, included in proposed the action list and implemented.	Noted
200303161: William (Bill) Grace	2	<p>Most of the world is struggling with a definition of Sustainability that is meaningful. The draft Strategy has adopted the following:</p> <p><i>Meeting the needs of current and future generations through simultaneous environmental, social and economic improvement.</i></p> <p>While recognising the difficulty inherent in any definition, and the improvement of this over the initially proposed definition, I believe that the above remains problematical, for the following reasons:</p> <ul style="list-style-type: none"> • It reinforces the view that the 3 constituent components are separate when they are actually interdependent subsets (economy as a subset of society, and both as a subset of nature) • it doesn't provide guidance on how to act to meet the stated aim (<i>meeting the needs...</i>), nor how to recognise progress. <p>A similar definition, but one that addresses the latter point in particular is:</p> <p><i>Optimisation of the resources at the disposal of human societies in order to sustain and enhance quality of life over the long term.</i></p> <p>This clarifies more explicitly that what we are trying to "sustain" is our society, and "optimisation" provides guidance on how to progress, and can be applied to all forms of human endeavour...</p> <p>Note: See original copy for more details</p>	Definition has been changed and will go some way to addressing concerns. Proposed definition would not be widely understood and is open to many similar questions of definition.

Background *continued*

200303161: William (Bill) Grace	5	<p>The Major Gap in the Draft Strategy: To me the glaring omission in the draft Strategy is (ironically) that issue which governs the ultimate sustainability of our communities in Western Australia – the economy. While the draft Strategy describes the importance of industries in the natural resources sectors, there is no overall analysis presented of the foundations of the Western Australian economy and:</p> <ul style="list-style-type: none">• Whether the present dominant economic activity is itself sustainable• Whether present Industry policy is compatible with sustainable economic growth• How susceptible our quality of life is to eventual changes in the economic mix resulting (for example) from resource depletion and degradation of arable land• How we are to guide our economy towards sustainable economic growth in the best interests of the community. <p>In the absence of any analysis of the “big picture”, the Strategy tends to focus on how we might improve the social and environmental performance of existing economic activity, rather than propose a blueprint for the long term economic management of the State</p>	<p>The economy is discussed more in the final Strategy though it does not address these issues in depth.</p> <p>These remain issues worthy of consideration by economic agencies in government as well as the major industry groups or universities.</p>
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Background *continued*

200303161: William (Bill) Grace	5 cont.	<p>The most obvious sector for analysis is minerals and energy, which according to the draft Strategy accounts for 25% of Gross State Product and 17% of employment. By definition these industries are based on non-renewable resources, and in the long term these resources will disappear. As a community we will need to replace the present economic (and associated social) benefit we derive from these industries with something else. What will it be? When do we need to start making the transition? Are we (as a community) deriving the optimum benefit from these finite resources?</p> <p>How this and subsequent governments manage the State's resources through its Industry policy will ultimately have the largest impact on the sustainability of our communities. Buried on page 202 of the document is the stated objective "<i>Ensure that economic policy in WA is consistent with the principles of sustainability.</i>" It is imperative that the economy receives a higher priority in the final document and that the government's pivotal role in managing the State's economy is recognised in the Sustainability Strategy.</p> <p>The final strategy should include:</p> <ul style="list-style-type: none">• an overall analysis of the WA economy• an identification of the long term threats to our economic base from resource depletion, environmental degradation (including climate change), and market trends <p>a strategy to make the above permanent features of Government reporting and to link them to the State's economic management including through industry policy.</p>	See Above. The draft Industry Policy is about the WA economy
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Background *continued*

200303161: William (Bill) Grace	6	<p>Wording: Inherent in the wording of some of the actions is hesitance about support, and / or the priority of the proposal. For example “Move towards...” or “Work towards...” or “Promote...” are used in relation to a number of important recommendations, eg</p> <ul style="list-style-type: none"> • Sustainability assessment of state significant projects • Adoption of Liveable Neighbourhoods • Home energy ratings <p>While there may be legitimate concerns from some stakeholders over proposed Actions, this terminology suggests further debate rather than a specific Action, and could result in responsible parties doing little or nothing. If further work needs to be done to define the eventual action, this is what the recommendation should say. For example (4.13):</p> <p>“Involve all relevant stakeholders in finalising the current review of Liveable Neighbourhoods, with a view requiring all government and significant residential development to adopt the framework.”</p> <p>This confirms the end result, and it is much easier to develop an Implementation Plan for a “review” than a “move towards”.</p>	The final Strategy is more definitive in its actions.
	7	<p>Categorisation: The draft Strategy says the Government will develop a detailed Implementation Plan for the final Strategy. This Plan must include:</p> <ul style="list-style-type: none"> • What is to be delivered, including: <ul style="list-style-type: none"> ▸ The proposed Action ▸ How it relates to the objectives and goals of the Strategy ▸ How monitoring and evaluation will occur • Who will deliver, including: <ul style="list-style-type: none"> ▸ Roles and responsibilities of key players ▸ Resource and capacity issues • Timelines, including: <ul style="list-style-type: none"> ▸ Time required to gear up ▸ Time to implement • Budget, including: <ul style="list-style-type: none"> ▸ Capital and establishment costs ▸ Ongoing operational costs <p>The present draft contains a variety of “types” of Proposed Actions. Some are extensive in their implications (eg the establishment of a major science-education facility), and others are merely policy modifications (eg expansion of existing sustainable tourism accreditation). The ramifications for the development of an Implementation Plan therefore vary significantly from action to action.</p>	Each action has a responsible agency. See <i>Implementation and Action Plan</i> .

Background *continued*

200303161: William (Bill) Grace	8	<p>Responsibilities: Determining the various institutional responsibilities for the implementation will be a critical component in the success or otherwise of the Strategy. The government faces a huge challenge to create interfaces across the various agencies to facilitate a whole of government approach to Sustainability.</p> <p>Both the planning and the implementation of nearly all of the recommendations will require consultation between different groups. It is suggested that responsibilities for each Action are clearly defined, eg:</p> <table><tr><td>Primary Role</td><td>The Agency that takes the lead role in implementation, and identifies other parties to be consulted.</td></tr><tr><td>Consultative Role</td><td>Others take the lead role, but the Agency is consulted and contributes to implementation and review of progress</td></tr><tr><td>Review Role</td><td>The Agency contributes to implementation and the review of progress</td></tr><tr><td>Informed</td><td>The outcome is relevant to the Agency and it is informed of implementation plans and progress.</td></tr></table> <p>This proposal is suggested as a way of managing the stakeholder interfaces generally across the Strategy. This would create a network across State / Local government, WA collaboration, business etc that would facilitate both a clear understanding of who is working on what, and a holistic approach to the tasks</p>	Primary Role	The Agency that takes the lead role in implementation, and identifies other parties to be consulted.	Consultative Role	Others take the lead role, but the Agency is consulted and contributes to implementation and review of progress	Review Role	The Agency contributes to implementation and the review of progress	Informed	The outcome is relevant to the Agency and it is informed of implementation plans and progress.	Primary roles have been determined.
Primary Role	The Agency that takes the lead role in implementation, and identifies other parties to be consulted.										
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	7 cont.	<p>In order to facilitate the development of a coherent Strategy, and a companion Implementation Plan it would be useful to categorise all the proposed Actions. The following is a suggested for consideration:</p> <ul style="list-style-type: none">-Establishment (Global Centre for Sustainability etc)-Legislation / regulation / etc (Biodiversity Conservation Act etc)-Strategies / plans / policies / procedures etc (Regional Sustainability Strategies, Bioprospecting policy etc)-Studies / investigation (Population / Consumption study, parking demand etc)Training / capacity development / awareness	Noted.								

Background *continued*

200303069: Australian Petroleum Production and Exploration Association (APPEA)	P 2, par 4-6	<p>APPEA notes that the W.A. Government has adopted the term 'sustainability' instead of the now globally accepted term 'sustainable development' and has also developed its own definition of what 'sustainability' means.</p> <p>APPEA disagrees with the use of the term sustainability, preferring the globally accepted term <i>sustainable development</i>. APPEA recommends that the W.A. Government also adopt the globally accepted definition of sustainable development defined by the World Business Council for Sustainable Development (WBCSD) as:</p> <p><i>"...forms of progress that meet the needs of the present without compromising the ability of future generations to meet their need."</i></p>	<p>Noted.</p> <p>Both sustainability and sustainable development are used.</p> <p>See paper "Response to submissions on Sustainability Concept".</p>
	P 3 par. 2-6	<p>APPEA believes the W.A. Government's use of the term 'sustainability' and the redefinition of sustainable development concepts are inconsistent with national initiatives, strategy and policy for sustainable development. Further, the draft Strategy report premise conflicts with globally accepted terminology and the broader community and industrial understanding of sustainable development. APPEA believes new terminology is unnecessary and in some respects, counter-productive to the continuing development of national and global understanding and acceptance of the sustainable development concept.</p> <p>APPEA urges the Government to reconsider the theory of achieving sustainable development only by delivering a net benefit across the triple bottom line and meeting the needs of current and future generations.</p> <p>It is often impractical to deliver net benefits to each area of the triple bottom line simultaneously - an 'all-or-nothing' approach to development. Achieving an aggregate benefit through risk management and accepting reasonable trade-offs across the triple bottom line will be far more effective and beneficial to the W.A. community, than attempting an 'all-or-nothing' net-benefit objective.</p> <p>APPEA does not support the draft Strategy's definition and intention that sustainable development is achieved only when the needs of current and future generations are met simultaneously. Our generation cannot presume to know what the needs of future generations are. It would have been ridiculous if our forefathers had presumed to know our needs today. The industry believes that using our best efforts to meet current needs without compromising the opportunities of future generations is the most realistic approach to present day obligations.</p>	<p>See paper: "Response to submissions on Sustainability concepts."</p>

Background *continued*

200303074: WA Sustainable Industry Group (WASIG)	3, p.5	The WA SIG would however like to reiterate its concern on the use of ' <i>sustainability</i> ' and ' <i>sustainable development</i> '. In accordance with best practice in many international forums, WA SIG regards ' <i>sustainable development</i> ' as the process leading towards ' <i>sustainability</i> ', through integrated and coordinated improvements in social, economic and environmental performance. ' <i>Sustainability</i> ' is the only vaguely conceptualised, inspirational final outcome of the process. Despite WA SIG's concerns, for the purpose of transparency with the Draft State Sustainability Strategy, ' <i>sustainability</i> ' will in this submission further be regarded as the ' <i>sustainable development process</i> ' (or journey) rather than the ' <i>destination</i> '.	See paper "Response to submission on Sustainability concepts".
	2, p.10	The WA SIG recommends that the sustainability definition be made more accessible by recognising the importance of contributions by businesses, civil society and government agencies that only explicitly deal with one or two goal areas in sustainability, provided these do not undermine progress towards any of the other goal areas.	See paper "Response to submission on Sustainability concepts".

Process to develop the draft strategy

CIB #	Submission paragraph no.	Paragraph Text	Suggested Changes
200302234: Youth Arts Networks WA	2	Our concern with the draft strategy is that it may not represent and incorporate young people's views and valuable contributions due to the consultation processes employed. Upon questioning a staff member involved in the draft strategy, we were informed that there had been some opportunities for young people to be involved in the formation of the strategy. These included involvement of Murdoch University students, a workshop at the Student's and Sustainability Conference in July 2002 in Perth, and a workshop at the Youth Affairs conference in May 2002. These are certainly good beginnings or engaging young people in the consultation process. However, these workshops would have attracted a very specific demographic of young people, and thus our concern remains that a wide range of young people did not have the opportunity to be involved due to a lack of appropriate opportunities.	Agreed, but an attempt was made through involving 53 university students in undertaking background research to support the development of the Strategy.
	4	Develop and implement best practise guides for appropriately consulting with young people. Involve key organisations and young people themselves in the development of these guides Revise them regularly.	This is reflected in <i>Consulting Citizens: A Resource Guide</i> , prepared by the Citizens and Civics Unit.
200303352: Rosalie Vinicombe	1	This letter is from the perspective of a young person. We are the ones of the future; we are the ones who will be left to deal with the repercussions of the decisions that are made now. So then I ask, why does this document and the processes used in getting to this document, not in any way appeal to young people. This seems absurd. I feel that the government's concept of sustainability is very different from my concept of sustainability. It seems to me that so often the government overrides ecology with economy.	Young people have been involved with and do get excited about the State Sustainability Strategy.

Process to finalize and implement the Strategy

CIB #	Submission paragraph no.	Paragraph Text	Suggested Changes
200302959: City of Fremantle	50	The City of Fremantle supports the development of the detailed Implementation Program but also suggests that this is associated with a public review period to ensure expectations are adequately met. In addition, an effective and engaging Communication Plan for the Final Strategy will be required to gain local community support, now and into the future. The Communication Plan should be implemented and supported by dedicated staff within government with adequate resources.	The State Sustainability Strategy will be reviewed in two years. A Communications Strategy will be developed.
200300089: Phil Thompson	3	Page 18: ref. proposal that the final Strategy will be implemented over the next 5 to 10 years: real sustainability will take much longer than this, particularly to make the sort of changes required to our economy to transform it from essentially a 'growth' dependent economy to one which does not depend on growth. For example, imagine the sort of changes required to Perth's economy to make it one which does not dependent so much on continued growth of new suburbs, and the implications of this for the land development and home building industries, and related industries such as furniture, white goods etc suppliers.	The 5 to 10 years relates to the actions suggested. Sustainability is longer term.
200217558: Stuart Hawkins	3	I am disappointed with the list of proposed actions. Many of the proposed actions will, by themselves, not achieve sustainability. I provide a fragment list of examples from the Consultation Draft below: <ul style="list-style-type: none"> • Establish an Industry-Government Working Group.... • Develop a Sustainability Code of Practice.... • Establish a partnership... • Support a State-Local Governed Sustainability Roundtable... • Establish a Strategic Alliance.... I do not believe that the formation of working groups, partnerships, codes, alliances (ect) such as those listed above will achieve sustainability. The actions need to be outcome focused with the actions specific and achievable.	Action best follows collective thought. Action without this can be counter productive. There are many action items that do not involving working groups.

Process to finalize and implement the Strategy *continued*

200300359: Bernhard Bischoff	5	<p>'Sustainability and the individual'</p> <p><i>I would like to see a chapter about this subject matter added to the 'proposed priority areas for action' to dispel the impression that sustainability is a problem for government and other institutions only – an impression a superficial look at the consultation draft may create. There is a desperate need to encourage West Australians to take on sustainability as a personal philosophy or objective.</i></p> <p>Of the many actions individuals can take only a few may be mentioned here</p> <ul style="list-style-type: none"> • Healthy eating and drinking • Energy conservation at home • Water wise gardening • Waste reduction • Weed awareness • Reducing vandalism of all kinds • Getting involved with management of the natural environment • Casting a vote for sustainability aware candidates 	Agreed but this is best done as part of the public awareness process proposed.
200215541: John McBain	P 4 par. 4	The many regional seminars conducted by Dr Newman enabled the draft strategy to be discussed across much of the state. However, these seminars were nowhere near as comprehensive as the series held in Perth, even though some of our most pressing sustainability issues exist in regional areas.	Agreed
	P 4 par. 5	<p>Whilst acknowledging the important commitment to sustainability by the present government in this process, and in light of the above, I conclude that the process, by its own definition, is unsustainable, as :</p> <ul style="list-style-type: none"> - It is socially inequitable and discriminatory -The finances allocated were insufficient for a comprehensive process, and participation depended largely on financial capacity to do so. 	Regional Sustainability Strategies should provide the opportunity for consideration of regional issues.

Process to finalize and implement the Strategy *continued*

200309647: Communications Advisory Committee	3, par 4	With respect, CAC submits that the concept of " <i>simultaneous</i> " and " <i>improvement</i> " in the definition are unrealistic and unrealisable. The very fuzziness is likely to be anti-development in Western Australia whose future lies in responsible future development, in which, as we will show, effective communications to remote and regional areas is essential, often a prerequisite. If we wait for " <i>simultaneous</i> " improvements, the State will stagnate. We recommend that for a far more suitable definition for Western Australia is that expressed personally by Mrs Brundtland in her Foreword to the World Commission Report: "What is needed now is a new era of economic growth – growth that is forceful and at the same time socially and environmentally responsible."	The definition of sustainability adopted in the final Strategy does not include reference to simultaneous.
200303348: Conservation Council of WA	2, par 2	As far as consultative processes are concerned, inviting written submissions (as in the process of developing "Focus on the Future") is the bare minimum required. At very least, the public submissions should be responded to, either in the document or in a separate document.	Agreed