

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

Section Five – Sustainable Use of Natural Resources Introduction

| CIB # | Submission paragraph/ page # | Paragraph Text | Response |
|--|---|--|---|
| 200218739: The Social Responsibilities Commission | 9 | <p>Concern No. 1: Treating the Natural Environment as a Rights-Bearing 'Legal Person'</p> <p>First, proposals to absolutely limit exploitation of the Western Australian environment need to be extended beyond those specific measures in the Draft Strategy. There is a need for a much broader <i>paradigm shift</i> in which Western Australia's natural environment is treated not as an abstract entity but rather as a defined 'legal person' with defined legal rights over natural resources. In our litigious, legal rights-based society treating the natural environment as a legal rights-bearing 'individual' would be a hugely powerful step in signalling a commitment to sustainability. An independent Natural Environment Rights Protection Trust, or something similar, could be established with initial and ongoing grants from government and the community to pay the legal costs of defending the natural environment's rights when infringed.</p> | Noted. |
| 200303139: Kimberley Development Commission | 6 | <p>More specific concerns that have been identified with respect to content are:</p> <p>The absence of strategies targeting the negative impacts on communities and the associated effect on their sustainability caused by significant royalties and benefits being exported out of the regions specifically from the Resources Sector.</p> | Noted. |
| 200300297: City of Joondalup | 35 | <p>A quantitative assessment is needed to assist in determining the effectiveness of sustainability initiatives, and to provide a target for what is deemed "sustainable". State of the Environment reporting and sustainability indicators are therefore a high priority. The draft strategy needs to give some guidance to define the end point by which sustainability is achieved. It is important that the document tries to be more finite, and that clearly defined goals be included. Monitoring and auditing of the strategy implementation is important, to enable an assessment of the effectiveness of strategy implementation to be made.</p> | <p>This point has been expanded in the final Strategy and <i>State of Sustainability Reporting</i> is proposed. See <i>Measuring and Reporting Sustainability</i></p> |

Introduction *continued*

| | | | |
|----------------------------|----|---|--|
| 200219280: City of Swan | 35 | Key local government environmental initiatives are not discussed in the document ie. Cities for Climate Protection, Perth Biodiversity Project, support of catchment & 'friends' groups (little mention made of the work these groups do in general), and used as examples of potential mechanisms / leverage for sustainability at the community level. Recognising and capitalising on successful programs will be vital in delivering the recommendations of the draft Strategy. | Additional acknowledgement of these programs is given in the final Strategy. |
| | 36 | More work is required on indicators and targets - who will be responsible for measuring? - Are these the most appropriate indicators / readily obtainable? How often will indicators be reported on and do they feed into compulsory regular State of the Environment reporting process for State & Local Govts. | See <i>Measuring and Reporting Sustainability</i> . |
| | 37 | There is an additional workload and responsibility being placed on local governments by the State in terms of environmental planning & management, eg. the downgrading of noxious weeds and making individual Council's responsible for determining - and enforcing action against - those environmental weeds in their LGAs. This is not a sustainable outcome - due to resource limitations some local governments will pick up, but many will not be able to. | The Strategy recognises the need for ongoing dialogue with Local Government on a range of sustainability initiatives and the State Government will continue to work with the Western Australian Local Government Association on the development of a Sustainability Partnership Agreement. |
| 200219280: City of Swan | 38 | Continual research and information needs to be made accessible to local governments and their communities in regards to environmental issues. | Agreed. |
| | 39 | Many actions are listed - there could be a bit more consistency / cohesion between these. | Noted. |

Introduction *continued*

| | | | |
|---------------------------------------|----|--|---|
| 200217800: Michael Bell | 40 | <p>Provide better incentives for private vehicle owners to convert to gas by the following;</p> <ol style="list-style-type: none"> 1. Put Pressure on car manufacturers to make gas powered cars at competitive prices. Perhaps tax relief on gas cars or increased tax on petrol cars can make these cars more appealing. <p>Support these measures for the environmental benefits and not for political economic reasons. (use the triple bottom line principle)</p> <ol style="list-style-type: none"> 2. Through taxes, even out the difference or increase the cost of petrol cars. 3. Advertise this cheaper gas on T.V. along with the current petrol prices. 4. Detach linkages with petrol price rises. (it isn't a petrol product) Find out why gas price varies wildly, 41c to 95c per litre (cheaper in Melbourne and Queensland than Perth) 5. have slow fill devices removed from fuel stations. 6. More gas outlets to be installed 7. Educate people about the benefits of gas only as a better fuel (petrol and gas cars are a compromise, straight gas can be more efficient) | Noted. |
| 200303161: William (Bill) Grace | 16 | <p>Industry Policy: As explained in Section 2.2 above I feel the draft Strategy insufficiently deals with the "big picture" economic agenda for the State. While I have no problem with the proposed actions under the various headings in this section, what is missing is an umbrella of Industry policy that would inform the agenda for each of these sectors. Such a policy needs to be developed for the State and then interpreted into regional policies through the regional strategies.</p> <p>Without this overall industry policy, we will continue to be reactive to development proposals and the environmental and social impact assessments will continue to be seen as anti-development by prospective project developers. Both prospective developers and regional communities (through their regional councils) should be aware and supportive of policies that have been developed for the long term economic, environmental and social benefit of the region.</p> <p>This point again reinforces the need to:</p> <ul style="list-style-type: none"> • have a meaningful partnership with industry and potential employers. <p>Include the role of Development Commissions in Regional Councils</p> | The Government released a Draft Industry Policy <i>Future Prosperity: Creating Jobs and Wealth through Industry Development</i> for public comment on 10 July 2003. |

Introduction *continued*

| | | | |
|---|---|---|---|
| 200303074: Department of Conservation and Land Management | Page 9, last para | It is recommended that Chapter 5: <i>Sustainable Use of Natural Resources</i> be renamed to <i>Sustainable Natural Resource Management</i> . <i>See original doc for further justification.</i> | Agreed. See <i>Sustainable Natural Resource Management</i> . |
| | Page 10, para 1 | In order to adequately sustain biodiversity, and to ensure sustainability objectives are met for future generations, it is necessary that mechanisms be in place to manage and control these threatening processes (e.g. grazing, mining, weeds, feral animals, dieback and other exotic diseases, salinity and inappropriate fire regimes). This should be identified in the State Sustainability Strategy under an additional priority area named <i>Sustainable Biodiversity</i> , and objectives and resources allocated accordingly. | Threatening processes to biodiversity are reflected in the final Strategy. An additional priority area <i>Sustainable Biodiversity</i> is not included. |
| | Page 10, para 2 | The State Sustainability Strategy also needs to recognise that there is an inevitable cost to the environment and to biodiversity as a result of the above threatening processes (e.g. grazing, mining, weeds, feral animals, dieback and other exotic diseases, salinity and inappropriate fire regimes) and land use developments. This cost may be via the drain on the resources of conservation agencies from managing the threat or dealing with land use projects, and the uncosted loss of ecosystem values and services. In dealing with these environmental costs, the State Sustainability Strategy needs to recognise the concept of 'no net loss to biodiversity' and the application of environmental offsets in decision-making for land use projects that may threaten biodiversity values. | Increased recognition of these factors is included in the final Strategy. |
| | Page 10, para 3 | In the sections on the sustainable management of natural resources, the State Sustainability Strategy should provide a brief discussion on the spatial and temporal scales required to achieve sustainability outcomes, as this will be critical in providing an appropriate framework for management and evaluation. <i>See original doc for further details</i> | Noted. |
| | Page 10, last para, page 11, first para | Chapter 5 of the draft State Sustainability Strategy fails to address the sustainable use of the State's biological resources (<i>e.g. beekeeping, wildflower picking, seed collecting, firewood collecting, kangaroo harvesting, and emu and crocodile farming</i>). The Sustainability Strategy should recognise the impacts that these activities potentially have on the conservation of the State's biodiversity, and the intervention that is required to ensure that practices remain sustainable. It would be useful if this was made a priority area within the Strategy, which addresses the management issues associated with the sustainable operation of the industries, and proposed actions and targets/indicators to guide the sustainable management of the industries into the future. | This has been incorporated into the final Strategy. See <i>Maintaining our biodiversity</i> . |

Introduction *continued*

| | | | |
|---|----------------|--|---|
| 200303074: CALM | Page 8, para 4 | An additional priority area in Chapter 5: <i>Sustainable Use of Natural Resources</i> should also be created which is committed to sustaining the values and managing the threats of the State's biodiversity values. | Not supported. |
| 200303048: Conservation Commission of WA | 2, pg. 14 | In the Commission's view the precautionary principle should become a required part of all new Western Australian natural resource management law and policy. <i>The Commission recommends that the Final Sustainability Strategy should present a process for instituting the precautionary principle across Government, as suggested above. It is further recommended that when this process is complete, the outcomes should be written into the proposed Sustainability Code of Practice, and thereby into the proposed Sustainability Action Plans of relevant Government agencies.</i> | The final Strategy indicates that sustainability principles will be incorporated into relevant legislation when it is reviewed or drafted, including by reference to the Sustainability Act. |
| 200303074: WA Sustainable Industry Group (WASIG) | 5, p.18 | <p>Re: vision, goals and priorities for sect. 5: WASIG participants have expressed concern on four aspects in regard to sustainability in natural resources sectors.</p> <p>-A principal concern is the omission of energy as a separate sector for action in the natural resources agenda, as access to affordable energy services with acceptable environmental and social impacts is critical for any other form development. The coverage of sustainable energy in the sustainable settlements section only addresses greater use of energy efficiency and renewable energy – it is very unlikely that this subset of sustainable energy options will in the near future be sufficient to provide affordable energy services for WA.</p> <p>-Related is the omission of the coal sector – regardless of the question of whether or not one believes coal developments can make a net environmental, social and economic benefit, it can not be ignored that coal is a principal fuel in the current energy mix, and given the levels of investment involved, it is unlikely that this will drastically change over the next 1-2 decades.</p> <p>-Moreover, there should be recognition that even new industries that are considered to be 'sustainable' can have significant ecological footprints (such as tourism with a high ecological footprint as a result of the air and road travel required to bring tourists to sustainable tourism locations).</p> <p>-Some in the WA SIG have expressed concern about the strong reliance on codes of practice for each of the natural resources sub-sectors, as the impact of existing codes of practice and best practice guidelines is not un-contested. The contents of the codes of practice should be sufficiently innovative and challenging to drive continuous improvements in each of the sub-sectors, while independent verification is required for transparency and securing trust in the codes.</p> | <p>The final Strategy acknowledges the critical role of energy in all aspects of human activity within the <i>Sustainable energy</i> section.</p> <p>Noted.</p> <p>Increased emphasis has been added in the final Strategy to the need for all forms of tourism to be sustainable. See <i>Sustainable tourism</i>.</p> <p>Agreed.</p> |

Introduction *continued*

| | | | |
|--|----------|--|---|
| 200303266: Melville Conservation Group | 4 | Unless population is stabilised there will be no hope of sustainable resource management. Land-clearing and biodiversity loss will continue as we plunder the planet for resources. | See <i>Population, Development Aid and Environmental Technology</i> . |
| 200303073: Natural Resource Management Council | Point 17 | Some members have had experience with Environmental Protection Policies being used in addressing NRM issues and they have found them to be a relatively blunt instrument. In the case of the "Wetlands of the South West" policy, people needed to understand what the policy was trying to achieve. There needs to be communication and discussion as part of the implementation process for these policies. | The final Strategy notes that Environmental Protection Policies are a statutory process with potential application to natural resource management issues. |
| 200303590: WA Collaboration | Rec. 11 | <p>Resource use and sustainable consumption</p> <p>The State Government should establish a program to monitor the important parameters of Western Australia's resource use and consumption patterns and related environmental and social impacts.</p> <p>Ambitious, but achievable targets for reducing Western Australia's per capita ecological footprint should be adopted. Strategies for achieving these targets will then need to be developed and implemented. These strategies should not place a disproportionate burden on rural, regional or remote communities.</p> | This will be considered in the development of headline sustainability indicators. See <i>Measuring and Reporting Sustainability</i> . |
| 200303354: Western Power Corp | 14 | As indicated above, it would be appropriate for energy resources to be covered in this chapter. As it stands, energy is only considered under specific aspects such as Greenhouse and sustainable energy provision under Settlements. Energy resources are so fundamental to State development in both the domestic and international realms, they deserve strategic consideration of the associated environmental, social and economic implications of their utilisation within the State sustainability framework. For example there needs to be a strategic framework developed for sustainable management of gas reserves between domestic end use and export. | Noted. |

Sustainable Agriculture

| CIB # | Submission paragraph/ page # | Paragraph Text | Response |
|---|------------------------------|---|--|
| 200217800: Michael Bell | 23 | Local Government needs to be involved agricultural management. | This is reflected in the final Strategy. |
| | 27 | Salinity is a huge problem that will destroy everything living thing we know today if it is not stopped. City people need to be educated that these are the areas from whence our food production comes from!!!! Making up a significant large part of the WA economy. | See <i>Education and community awareness for sustainability</i> . |
| 200219350: Leschenault Catchment Council | 6 | While LWCC agrees that a shift in how landowners approach agriculture towards more sustainable practices and developing new industries, the strategy fails to address current problems such as salinity, poor farming practice, and declared pest flora and faunal species. | Existing Government programs are already in place to address these issues. |
| | 7 | The proliferation of exotic weed species and encroachment of garden and agricultural plant species into remnant native bushland and aquatic systems poses a significant threat to the long-term sustainability of these areas due to their ability of many pest species to out-compete many endemic species. | This is reflected in <i>Sustainable agriculture</i> and increased emphasis in <i>Maintaining our biodiversity</i> . |
| | 8 | The term "best practice" also needs to be clearly defined, and in some cases refined, with regard to the desired sustainable outcomes of the strategy. The State Government and its agencies need to take a leadership role in developing policy and subsequent Best Management Practices that can be adopted by industry and the community. | Agreed. |
| 200219175: City of Armadale | 15 | Proposed Action 3.3 is not supported as Strategic Planning for natural resource management should remain with the State government. | Noted. |
| | 18 | Proposed Action 3.6 is supported. It should be noted that the City is about to do research on cats. | Noted. |
| 200300308: Shire of Kalamunda | 4 | Furthermore it is noted that under sustainable agriculture, social and economic aspects are not mentioned yet they are raised in regard to fisheries and aquaculture. It is proposed that there is a need to include social and economic aspects into actions for agriculture to protect the continuance of agricultural industries and their communities while meeting environmental objectives. | Sustainability issues facing rural communities are addressed in <i>Sustainable agriculture</i> and <i>Maintaining biodiversity</i> . |

Sustainable Agriculture *continued*

| | | | |
|--|-------|--|--|
| 200300298: Information for Action | 9 | Agriculture also impacts on the land, poisoning it with pesticides and nutrients, which with sewage, cause algal blooms to appear in the Swan and other rivers with increasing frequency. | The final Strategy notes the off-site impacts of agriculture on the environment. |
| 200302880: City of Wanneroo | 33 | The salinity crisis will result in the loss of much biodiversity and farming land with resulting negative social and economic implications. The scale of the problem is far too widespread and complex to expect community groups, farmers and rural shires to tackle. The State Government needs to ensure that sustained and adequate resourcing is applied to ensure that this issue is effectively addressed. | Noted. |
| 200303160: Goldfields Esperance Development Commission | Pg. 7 | Natural resources in our region are of vital importance. Our economy is largely based on minerals exploration. This is perhaps the goal that the GEDC is most concerned about. The whole of Western Australia faces sustainability challenges in all these areas and the State Sustainability Strategy is a positive starting point to address these. | Noted. |
| 200311216: Zoe Moore | 35 | Guiding principles far too vague. | Noted. |
| | 36 | Box 23 – But what is sustainable agriculture? What does it look like? | See <i>Sustainable agriculture</i> . |
| | 37 | How about an overhaul of the EPA altogether? More independence for body etc. | Noted. |
| | 39 | The paradigm of agriculture that currently exists in WA and around the world is not challenged, monoculture crop farming that has resulted in land degradation, soil erosion, massive land-clearing and subsequent salinity; and the over-use of pesticides has not been over-turned in favour of sustainable practices. | The final Strategy notes the off-site impacts of agriculture on the environment. |
| 200300888: Blackwood Basin Group | 6 | Nutrient allocation in management of waterways – possibly in the Lower Blackwood. This idea needs to be developed further and may explore offset-type trading, where farming practices polluting part of the system (eg. Nutrient enrichment of waterways) could pay to fix up other parts of the system. This could work in an area where regulation of landowners was a threat, but not an immediate possibility. Ross George thought that this could be a good pilot project to explore as there were a number of new agricultural developments in the Lower Blackwood, there were good planning documents, high biodiversity values, and there was some threat of regulation of farmers in the area by agencies. | Noted. |

Sustainable Agriculture *continued*

| | | | |
|--|----|---|---|
| 200300888: Blackwood Basin Group | 7 | Examining the cost effectiveness of paying farmers to harvest fresh water to reduce demand on scheme water. This project would need a lot more exploration to determine its feasibility – especially with respect to the cost-effectiveness of engineering to harvest fresh water. | Noted. |
| | 8 | Protection of road infrastructure by tree planting in strategic areas. This project idea would explore the feasibility of planting trees in strategic areas near roadsides, to limit/ slow down the negative effects of salinity and rising ground water to infrastructure. There was some discussion as to the amount of mapping data available, a suggestion to speak to Jerome Goh of Main Roads, and various ideas, including that salt sensitive trees could be planted as an early indicator of salinity. | Noted. |
| 200300368: City of Kalgoorlie- Boulder | 17 | The concept of pastoral leases need to be revisited to ensure long-term tenure is granted, this would assist with further capital investment in an industry presently lacking confidence as to the risk and return nature of their investments. | The Government is examining a number of issues relevant to the future of pastoral leases through the Planning and Infrastructure portfolio and in consultation with stakeholders. |
| | 18 | Serious consideration must be given by the State Government to the concept of pastoralists as land managers as well as graziers. On-going financial support for land management, rather than grazing would also assist in the revitalisation of local pastoral communities. | The Government is examining a number of issues relevant to the future of pastoral leases through the Planning and Infrastructure portfolio and in consultation with stakeholders. |
| | 19 | Financial support of the state government for the pastoral regions that act as a buffer and quarantine barrier for introduced plants and pests, presently this work falls to the owner of the pastoral lease with limited support by the state government or other spheres of agriculture who are the principal beneficiaries of these works. | The Government is examining a number of issues relevant to the future of pastoral leases through the Planning and Infrastructure portfolio and in consultation with stakeholders. |
| 200300363: Eastern Metropolitan Regional Council | 44 | The proposal to establish Regional Councils as part of the partnership agreement to promote sustainable agriculture and other natural resource management activities (Action 3.3) is strongly supported. The EMRC provides a successful model of a partnership with the member Councils to enable a strategic long-term focus to address regional issues such as landcare, catchment management, biodiversity conservation, revegetation programs and wildlife corridors. | Noted. |
| | 45 | Improving the coordination of fox and feral animal control programs through Local Government and farmers' involvement (Action 3.6) is supported, but will require funding and resources given that this activity is not part of core business for Local Government. | Noted. |

Sustainable Agriculture *continued*

| | | | |
|---------------------------------------|---------|--|--|
| 200217800: Michael Bell | 23 - 26 | <p>Local Government needs to be involved agricultural management. Farm waste is a big problem, silage plastic disposal is one major area of this, in America they compact it in something like a old square bailer, then it is recycled into various plastic products, such a scheme here would probably need some form of Government assistance because of viability problems, but it would save a large environmental problem!</p> <p>Some farms need a program of tree planting to replace trees that have been killed from soil compaction, superphosphate or ringbarking by stock.</p> <p>Farmers need to be paid to look after remnant bush etc. as an incentive to do so, or the pressure to ever increase their cleared land or stock grazing areas through decades of declining farm income and declining rainfall will put pressure on farmers to use these areas.</p> | The closer involvement of Local Government in natural resource management issues is reflected in the final Strategy. |
| 200303163: Brian Fleay | 5, p.4 | Re-inventing more sustainable agriculture and rural communities in Australia will take time – decades. The use of petroleum products will be indispensable to achieve this transition. <i>This task must have first call on our remaining petroleum products.</i> | Noted. |
| 200303161: William (Bill) Grace | 17 | <p>Sustainable Agriculture: As the grandson of one of the pioneers of the north-east wheatbelt, I am familiar with the economic, environmental and social realities in the bush. This section of the draft Strategy makes for very depressing reading. While the development of Regional Councils will provide coordination of action, simultaneously:</p> <ul style="list-style-type: none"> • Remediating degraded land, and • Changing to more sustainable agricultural practices <p>is a huge task. As noted in the draft Strategy <i>"serious doubts exist as to whether agricultural industries can finance the adoption of remedial and truly conservation-oriented farming systems."</i> Given the importance of sustainable agriculture to our future, addressing this problem is possibly the most important single challenge we face as a nation. The proposed actions, while important, will not in themselves fix this problem. We need to face the fact that highly innovative, long term and expensive strategies will need to put in place if we are to succeed.</p> <p>The development of such strategies, which must also involve the Federal Government, should be a key recommendation of the final Strategy.</p> | Noted. |

Sustainable Agriculture *continued*

| | | | |
|--|-------------|---|--|
| 200215541: John McBain | P 14 par. 2 | Pest control –...The commitment to lessen the impact of these from government and private enterprise is sadly lacking. For example ; (a) The release of the Calesi virus has had a short term impact on rabbit populations across Australia, creating an opportunity to lessen their populations by other methods such as trapping. Yet no agency in Australia has taken advantage of this opportunity, nor introduced measures that will encourage private individuals to do so. | The final Strategy has increased emphasis on bio-security. See <i>Sustainable agriculture</i> . |
| | P 15 par.1 | Live animal exports – there is a high level of concern in our society about the way livestock are treated when exported live, raising questions about the sustainability of this aspect of agriculture. Key aspects of such concern can be traced back to the length of time taken to reach destinations and conditions of livestock whilst being transported. Chris Burbury (one of the pioneers of sheep export in WA) and I have collaborated on ways to improve this industry. Access to those suggestions and papers can be arranged by contacting myself. In addition, I am concerned about what happens to the manure collected during transport – export of manure from a paddock, farm , region, state or country is a prime example of an unsustainable practice. | Outside the scope of this report. |
| 200303073: Natural Resource Management Council | Point 9 | From an agricultural viewpoint, farming systems need to adjust dramatically to cope with climate change, natural resource management, sustainability, fluctuating markets, etc. Assistance will be required to make the radical changes; members felt funding for adjustment is needed but with rigorous conditions that promote sustainability attached. | The final Strategy has increased emphasis on supporting the sustainability of farming enterprises through improved self-management in a range of areas. See <i>Sustainable agriculture</i> . |
| | Point 9 | Wind erosion and other agriculturally induced factors are impacting on biodiversity and causing loss in our natural diversity. Members felt this issue was not addressed well. | The final Strategy acknowledges the impact of land clearing and other factors on biodiversity in Western Australia. See <i>Maintaining our biodiversity</i> . |
| | Point 9 | There is an opportunity to change the way land is managed through carbon credit agreements, but it is considered that this would be more influential if the Kyoto Agreement was signed by Australia. | See <i>Responding to greenhouse and climate change</i> . |
| | Point 9 | Council believes there needs to be the economic incentives present to promote voluntary change to land uses that will move to sustainable practices. Research, development and extension on new deep rooted, commercial crops is necessary to tackle salinity and other issues. | The final Strategy contains reference to the need to undertake research on investigating economic incentives and innovative instruments as drivers of land use change towards more sustainable use. See <i>Sustainable Agriculture</i> . |

Sustainable Agriculture *continued*

| | | | |
|--|-----------|---|---|
| 200303073: Natural Resource Management Council | Point 9 | Managing the necessary change in agriculture is also a challenge to educate the younger farmers. The average age of landholders is such that they are unlikely to make a major shift in their farming practices, and therefore there needs to be a focus on the younger, better-educated, farmer. | Noted. |
| | Point 10 | All food produced should be safe and of an acceptable quality. There is no direct reward for a farmer in broad acre farming in following an environmental management system. There are no market signals that indicate to farmers that it is worth pursuing accreditation. For some smaller commodities (eg milk, horticulture), there is an incentive but this market tends to be created by the middleman, not the consumer. | Noted. |
| 200303443: State Development Portfolio | 104 | In regards to water quality, it is important that widespread introduction of perennial crops, native revegetation and riparian/riverbank zone protection and restoration are an integral part of the Strategy response to fresh water systems in agricultural areas. It is unlikely that drainage systems alone will prove to be a feasible solution to improving water quality and limiting dryland salinity in WA. | Noted. |
| | 105 | In consideration of climate change and greenhouse gas emissions, it is important that ongoing effort is focussed on reducing emissions from farming practices as far as is practicable and also ensuring that the agricultural sector is able to adapt to the potential effects of climate change. It is likely that adaptation to climate change will present the greatest challenge to agricultural communities. | The final Strategy has increased emphasis on undertaking research to quantify the emissions of non-CO2 greenhouse gases from agriculture and promoting industry development opportunities including bioenergy and 'carbon farming'. |
| 200303350: Graeme Olsen | 2 | Woody crop development could be one of the focal points of this strategy. However, the potential for development of new woody crops for Western Australia's agricultural areas, and the range of sustainability targets they could assist, is not clearly articulated. Further, one of the background papers gives an inaccurate and pessimistic view of the potential role of woody crops in salinity management.... improved land management, biodiversity enhancement and protection, regional employment and community support, and production of new products including renewable fuels. | The final Strategy has increased emphasis on the role of woody crop development. See <i>Sustainable forestry and plantations</i> . |
| | 5, pg. 16 | (Section is) too short to offer more than a glimpse at each issue. Each of these largecomplex issues deserve better than the truncated treatments presented in the draft Strategy. | Noted. |

Sustainable Agriculture *continued*

| | | | |
|---|-----------|--|--|
| 200303350: Graeme Olsen | 6, pg. 16 | Where a number of issues are discussed, they are often not placed in context, or their relative importance and applicability are not adequately explained. Major and minor issues are treated with equal gravity, and no attempt is made to set priorities. | Noted. |
| | 7, pg. 16 | Many obvious strategic questions are ignored. For example, if the greatest threat to biodiversity in Western Australia is due to a combination of clearing for agriculture, and the resulting inexorable spread of salinity, how is this to be resolved? | The Government has introduced legislation with severe penalties for unauthorised land clearing. |
| | 8, pg. 16 | In many areas there is a lack of analysis leading up to conclusions. Perhaps this analysis has been done elsewhere, but a summary of the logic behind each conclusion should be presented here. | Noted. |
| 200302729: Shire of Serpentine- Jarrahdale | 7, pg. 10 | <i>Objectives</i> "Facilitate land use changes within agriculture" to more sustainable practices. | The sentiment of this proposal is captured in the objectives of <i>Sustainable agriculture</i> . |
| | 1, pg. 11 | Action 3.2 This will need to be achieved through awareness raising, information provision and training on an ongoing basis. | Noted |
| | 2, pg. 12 | Action 3.3 The integration of sustainable agriculture through regional partnerships and local government is an excellent initiative. It should be noted and incorporated that currently Landcare deal with sustainable agricultural issues at a local level primarily. | Noted |
| | 3, pg. 13 | To achieve all the actions proposed a very strong information and training element will be required and this will be resource intensive. Disseminating information through the agricultural industry especially small scale operators is difficult and adequate resources will need to be allocated. | Noted |
| 200300298: Information for Action | 3 | Land clearing is an ongoing cause of erosion, salinity, desertification and species extinction. Australia continues to clear more native bushland (trees, shrubs and grasses) faster than any other developed nation. For every one tree planted about one hundred are cleared. While the WA Government is obviously aware of the problems, existing legislation is not being enforced and adequate legislation is not being put in place to protect the environment. The Government is too slow to act. WA lost between 3,000 and 5,000 hectares of native vegetation over the past year. | The Government has introduced a Bill containing strong new controls on clearing of native vegetation. This Bill is presently before the Legislative Council and its passage will be given a high priority by the Government. |

Sustainable Agriculture *continued*

| | | | |
|---|---------|---|---|
| 200300298: Information for Action | | Species loss is irreversible and currently species are being lost at a rate never witnessed on earth. The major cause in WA is land clearing and although action is being taken to reduce land clearing in WA, land continues to be cleared for housing, industry and infrastructure, both legally and illegally. Western Australia has important biodiversity and it is being lost forever. There is no excuse for the lack of action. The WA Government has clearly failed to protect bushland. | See above. |
| 200304161: WA Farmers | 10, p.2 | <p>WAFarmers comments on policy on Property Rights: The basic principles of this policy are:</p> <p>"The property rights debate is not about the issue of compensation per se but recognition of an existing right to use or access a natural resource. It also implies a responsibility on the farmer or landholder to utilise the resource in a responsible manner and in accordance with principles agreed in a legitimate planning and consultative framework.</p> <p>Governments must provide an adequate package of compensation and transition incentives:</p> <ul style="list-style-type: none"> • To offset any reduction in property values following the implementation of natural resource management controls where a landholders rights and legitimate and reasonable expectations have been diminished; and • To encourage voluntary stewardship particularly for public good environmental outcomes." | Noted. |
| | 2, p.4 | <p>WAFarmers does not support the principle of Environmental Management Systems (EMS) as they are currently being promoted.</p> <p>See attached 2002 submission to the Environmental Management Systems Working Group details the concerns that WAFarmers has with this process.</p> | Noted |
| | 6, p.4 | <p>Whilst this process (Strategy) is currently underway, progress is slow due to a perceived lack of commitment from Federal and State Governments and a lack of incentives to enlist the full support of industry.</p> <p>...It is only through this partnership process that the goals of the State Sustainability Strategy will be achieved in a manner that benefits the State as a whole.</p> | The final Strategy emphasise the importance of partnership approaches to address sustainability issues. |

Sustainable Agriculture *continued*

| | | | |
|--|----------------------|---|---|
| 200302774: Waste Management Association | 7-8, p.7 and p.11 | There needs to be a recognition of the role of the re-use of organic materials in agriculture and the considerable work already being undertaken in this area. There is a potential for significant contribution for composting processes to safely convert organic materials into a resource that will contribute to the productivity and sustainability of agriculture and in particular to the production of fresh food. An action plan should be included that encourages research and development of sustainable options for the production and use of composts and organic fertilisers. | This matter is better addressed by the Waste Management Board. |
| 200219116: Wheatbelt Development Commission | 14 | Given that Agriculture is one of Western Australia's major industries, the elements of this section are very weak. They are not innovative and there are no creative ways presented to suggest how to make the actions happen. | Noted. |
| | 15 | Furthermore, the suggested indicators and targets for agricultural actions will not necessarily appropriately measure agriculture sustainability. For example, agricultural businesses across the state have registered positive farm profit for a number of decades, but this has not been an accurate representation of agricultural sustainability. It is also questioned how the extent of rural and regional infrastructure directly relates to improved agricultural sustainability. It is considered that many other factors, beyond agricultural sustainability, influence the extent of rural and regional infrastructure. | Indicators have been removed. |
| | 16 | Whilst the strategy suggests these indicators are still undergoing development and testing, the strategy provides no concrete indicators to measure agricultural sustainability in the short term. The fact that this strategy has not provided answers and identified any clear targets indicates the strategy's vulnerability. | Indicators have been removed. |
| 200300358: F. Schnattler | p.5, 50 | Please, explain the term "aquaculture" and the intentions of this proposed action. | Aquaculture is defined in the <i>Fish Resources Management Act 1994</i> as the keeping, breeding, hatching or culturing of fish. The intention of this proposed action was to use saline water in rural areas to support the establishment of aquaculture. This is now more generally addressed in the final Strategy through an emphasis on diversification in agriculture. See <i>Sustainable agriculture</i> . |
| | | I am of the opinion that also members of the community can provide valuable inputs into the agricultural system. Eg., permaculture concepts. | Noted |

Sustainable Agriculture *continued*

| | | | |
|-----------------------------|--|---------------------------------------|---|
| 200300358: F. Schnattler | | Please, explain the EMU plus process. | The EMU Plus process is explained in the final Strategy. See <i>Sustainable Rangelands Management</i> . |
|-----------------------------|--|---------------------------------------|---|

Sustainable Fisheries and Aquaculture

| CIB # | Submission paragraph/ page # | Paragraph Text | Response |
|---------------------------|------------------------------|---|---|
| 200302155: Recfishwest | 4 | Recfishwest agrees that the development of a new marine planning strategy is required and believes that this action must be given the highest priority. We fully support that such a strategy must include a cross agency framework for integrated marine planning to ensure that marine and estuarine resources are adequately protected and managed across all habitats within a bioregional framework. | Noted |
| | 6 | Recfishwest strongly disagrees with your proposed action to continue to implement the Wilson Report recommendations. | The final Strategy indicates continued establishment of fish habitat protection areas to complement the marine park and reserve system together with the development of a State Marine Planning Strategy. See <i>Sustainable Fisheries and Aquaculture</i> and <i>Coastal and marine environments..</i> |
| | 7 | Western Australia needs a new approach to marine conservation. Pursuit of the Wilson Report would concentrate virtually all the resources available for marine conservation on a relatively small proportion of the marine and estuarine area ignoring the values, threats and management needs of the rest. Experience so far has also demonstrated that the process is hopelessly slow and it has elicited divisive attitudes from stakeholders, including those who might be expected to philosophically support further marine conservation. | See above. |
| | 8 | Recfishwest believes that the Wilson Report recommendations should be revised in the light of experience. It should be replaced with the Marine Planning Strategy recommended in 3.11 This is clearly stated in the opening box where the Environmental Alliance is quoted as pointing out the absence of an overarching planning system integrating a marine reserve system, fisheries management and the Commonwealth Oceans Policy. Recfishwest further has commented on the inadequacy of the Wilson Report in its submission to the current review of the Marine Parks and Reserves Authority by Alex Errington. | See above. |
| | 10 | Recfishwest believes that it is not sensible or, indeed, possible to try to rehabilitate the freshwater ecosystems of the South West. The declining rainfall and the various impacts of human settlement, including dry-land salinisation, will prevent the achievement of widespread rehabilitation. A more sensible action would be to establish and manage a "safe refuge system" to try to conserve the biodiversity of the South West freshwater fish stocks. | Noted. |

Sustainable Fisheries and Aquaculture *continued*

| | | | |
|---|----|--|--|
| 200302155: Recfishwest | 11 | The comments made by Recfishwest in respect to proposed action 3.13 also apply to this proposed action. | Noted. |
| | 12 | We believe that an additional dot point indicator or target should be the 'number of Western Australian fisheries that have demonstrated sustainable exploitation via the adoption of appropriate management arrangements'. | All indicators and targets have been removed from the final Strategy. |
| | 13 | We have concern that second dot point [under 'Indicators and Targets'] suggests that the increase in number and size of marine reserves have a direct relationship to the attainment of fisheries sustainability. Sustainability may be achieved in many regions through appropriate fisheries management without any marine reserves being implemented. We believe that this statement needs to be qualified to ensure that it does not give the impression that marine reserves are the only tool that can achieve sustainability or that the absence or minimal size of reserves must indicate failure. | See above. |
| 200311216: Zoe Moore | 40 | How about addressing overfishing as a <i>global</i> environmental issue? Para 4. Sustainable levels presently? On what grounds are they classified as sustainable? Especially if 'fully exploited'? | The final Strategy does not attempt to address the issue of overfishing at a global level. |
| 200300201: Pearl Producers Association | 16 | Against the demonstrated progress made in the marine park planning process the draft strategy seems biased when it promotes continued implementation of the Wilson report but emphasises "...with provision for substantial and well-designed sanctuary zones..."(p107, 3.13). The PPA questions this emphasis when the balance of the draft strategy talks about encompassing ESD and all its components - environmental, social and economic. PPA seeks explanation as to why sanctuary zones deserve special emphasis above other management measures? What research has been used to determine the benefits of a 'substantial' sanctuary zone compared to a well constructed, multiple use management plan set against ESD principles with smaller no-take areas as representative of the bioregion? | The final Strategy indicates continued establishment of fish habitat protection areas to complement the marine park and reserve system together with the development of a State Marine Planning Strategy. See <i>Sustainable Fisheries and Aquaculture and Coastal and marine environments..</i> |
| | 18 | proposed action (p107, 3.14) to establish fish habitat protection areas to complement the marine park and reserve system but there is no explanation as to why or how this will be done. | The establishment of Fish Habitat Protection Areas enabled under the <i>Fish Resources Management Act 1994</i> . |
| | 19 | Target indicators (p107) seem to be focused on the number of 'locked up' marine reserve areas rather than the effectiveness of the management plan measured against the conservation objectives of that regions management objectives which may be able to be achieved under a multiple use regime without no take/no touch areas. | All indicators have been removed from the final Strategy. |

Sustainable Fisheries and Aquaculture *continued*

| | | | |
|---|--------------------|--|---|
| 200300368: Kalgoorlie- Boulder | 20 | Aquaculture industry using saline waters also benefit mining communities through rehabilitating open cut mines. | Noted |
| 200217800: Michael Bell | 29 | I would have thought the Leschenault Inlet was a protected area, as there are migrating birds of which W.A. is a international signatory in agreements to protect, and there are rare fish species like Lampreys. But it would seem that this is not enough to stop suggestions that Collie river water should be siphoned off to Perth. | Outside the scope of this report. |
| 200303074: Department of Conservation and Land Management (CALM) | Page 11, para 3 | The level of knowledge of marine species diversity, distribution and ecology in this State is quite limited. A sound level of knowledge is essential to ensure that harvesting activities are ecologically sustainable. Without this sound scientific basis to ensure that marine flora and fauna can be managed in an ecologically sustainable manner, there should be an emphasis in the State Sustainability Strategy on the protection of marine diversity, rather than a default position of allowing extraction. | The final Strategy addresses both the sustainable use and management of fisheries and the protection of the marine environment. |
| 200303443: State Development Portfolio | 107-108 | The Strategy should also recognise the role of Commonwealth marine planning processes under Australia's Oceans Policy through Regional Marine Planning in managing fisheries and aquaculture in WA Sustainable Forestry and Plantations. | The final Strategy acknowledges that the State Government is working with the Commonwealth Government through the National Oceans Office to develop regional marine plans that encompass State and Commonwealth waters off the Western Australian Coast. See <i>Sustainable Coastal and Marine Environments</i> . |
| 200309737: Office for Women | 14 | The State Sustainability Strategy currently holds a number of opportunities for the inclusion of gender equity principles. They include ensuring that: . wet land development -production systems around wetlands include fishing, hunting, gathering and, agriculture. Failure to take gender roles and responsibilities into consideration can lead to displacement of women. It can be negative for households if men take over women's resources without taking over responsibility for the family welfare. Gender-blind investments in the fishing industry, in terms of capital, extension and training does not only cause problems for women, but also for the fishing industry. Women, who fish in shallow water where the fish breed, are rarely involved in "educational programs" on fish conservation. | Noted. The final Strategy gives increased emphasis to the intersection between gender and sustainability. See <i>Sustainability and community</i> . |

Sustainable Fisheries and Aquaculture *continued*

| | | | |
|---|-----------|---|--|
| 200302729: Shire of Serpentine- Jarrahdale | 4, pg. 11 | <i>Proposed Actions</i> Develop guidelines for achieving sustainable aquaculture that will assist state and local government in assessing development proposals for aquaculture. | This matter is better dealt with in the context of sustainability assessment more generally. See <i>Sustainability assessment</i> . |
| | 5, pg. 11 | <i>Indicators and Targets</i> Number of certified sustainable fisheries through the Marine Stewardship Council | All indicators have been deleted from the final Strategy. |
| 200303061: WA Fishing | | <p>The draft suggests that the good news around sustainability and fisheries management is due solely to a powerful regulatory system. This is not the full story. The success of commercial fisheries management in WA is as a result of the adoption of a rights based framework for fisheries management in WA. By allocating exclusive commercial rights to fish has resulted in the necessary security for investment and has encouraged the adoption of fishing practises that maintain the value of investment. The incentives under such an arrangement are to value add and to ensure that fish stocks are not overfished. The results of a secure investment climate in the major fisheries are self-evident. The success story for WA fisheries is as a result of a partnership between industry and the government. It is suggested that it is important for the State Sustainability Strategy to note this.</p> <p>It is also worth noting that the major fisheries in WA operate under cost recovery. That is the costs of management, enforcement, compliance and research are recovered fully from the fishing industry. Thus in regard to the fishing industry being a burden on the taxpayer this is not the case.</p> <p>We question the proposed action of provision for substantial sanctuary zones in each of the marine bioregions. This may well be a strategy in regard to marine reserves but the nature and extent of sanctuary zones will be determined as part of the planning process for individual reserves and will be determined on a case by case basis. This is the existing legislative and policy framework for implementation of marine reserves in WA. Thus asserting the need for large marine sanctuary zones is not consistent with current government approaches on marine conservation and there is no justification provided to support this need. Indeed worldwide there is much debate on the conservation value of alienating large areas of marine waters from human uses. The available evidence suggests that sanctuary areas may have value but it depends very much on the objectives of such reserves.</p> | <p>The final Strategy gives increased emphasis to the partnership approach between industry and government that contributes to the sustainable management of Western Australia's fisheries. See <i>Sustainable fisheries and aquaculture</i>.</p> <p>Noted.</p> <p>The final Strategy confirms the Government's intention to continue to expand the State's marine conservation reserve system through establishing six new marine parks and reserves over the next 18 months.</p> |

Sustainable Fisheries and Aquaculture *continued*

| | | | |
|--|----|--|---|
| 200300363: Eastern Metropolitan Regional Council | 46 | The majority of actions contained under this goal (Actions 3.10 to 3.16) are supported, but are the responsibility of the State Government and have limited implications for the EMRC and member Councils. | Noted |
| 200300358: F. Schnattler | | As stated in Draft Goal, but add ... within a bioregional framework that also includes community input. ... by the end of 2006. | Noted. |
| | | Please, explain what the Wilson Report recommends | The final Strategy does not refer to the Wilson Report but does refer to activities to establish marine parks and marine nature reserves. See <i>Sustainable fisheries and aquaculture</i> and <i>Sustainable Coastal and Marine Environments</i> . |

Sustainable Forestry and Plantations

| CIB # | Submission paragraph/ page # | Paragraph Text | Response |
|---|------------------------------|---|---|
| 200302880: City of Wanneroo | 35 | Consideration should be given to the preparation of an Environmental Protection Policy or similar statutory policy to control the spread of <i>Phytophthora cinnamomi</i> (dieback). This is of particular importance as it is recognised by Environment Australia as a ' <i>Threatening Process</i> ' that is likely to cause extinctions. The proposed development and implementation of rehabilitation plans for dieback affected areas should commence with the areas that have the highest identified ecological values. | This matter could be considered as part of the development of the Dieback Strategy. |
| 200311216: Zoe Moore | 41 | The Draft FMP does not promote sustainable forestry. Plantations- monocultures and the inherent problems of lack of biodiversity. | Noted. |
| 200302846: John Daw – Liberals for Forests | 1 | In the document you claim that the government has protected all old growth forests. However, it would seem that the Bureaucrats at CALM/forest Products have fooled you yet again. You should have put some much-needed new blood into these government agencies when you came to power. Instead, it's the same old people proposing the same old argument that the trashing and destroying of our High Conservation Value forests is sustainable, when it is not. It is irreplaceable, especially when rainfall is steadily dropping off. Surely you must know that these bureaucrats have effectively cut our old growth heritage forest in half by separating the old growth from the high conservation value forests? | Noted. |
| | Paragraph 1 continued | Your government may well have had a minimum of logging in the past but which are today effectively and truly old growth forests. This shows a very serious flaw in your draft document. It will mean the destruction of much native forest that should otherwise have been protected. Similarly, the size of the future cut in the new forest management plan at around 170 000 cubic metres is unsustainable. From where in the ether does your forest products commission pluck such a figure? Do you seriously think our poor old regrowth forests can sustain such severe logging? Even the lower figure of around 106 000 cubic metres of jarrah is unsustainable. | The Government has endorsed a Forest Management Plan for consideration by the Environmental Protection Authority. See <i>Sustainable Forestry and Plantations</i> . |
| 200300368: City of Kalgoorlie-Boulder | 21 | Presently largest potential supplier of sandalwood is the goldfields region. There needs to be more than just a management plan for the harvesting of this species. There needs to be an effort made to regenerate the sandalwood through plantations and or propagation of native sandalwood. Research into this potential industry (rather than opportune) would also lead to increased knowledge and employment in the rangelands. The Sustainable forestry and plantations seems very focused on the sou-west. | The Government's Infinitree Program supports the establishment of sandalwood plantations. See <i>Sustainable Forestry and Plantations</i> . |

Sustainable Forestry and Plantations *continued*

| | | | |
|---|--------------------|--|--|
| 200300363: Eastern Metropolitan Regional Council | 47 | Encouraging timber industry reforms (Action 3.17) and encouraging the transition toward plantation timber (Actions 3.18, 3.19, 3.24 and 3.25) are supported and will minimise the impact of harvesting native forests for timber production. | Noted. |
| | 48 | There is limited knowledge, understanding and assistance regarding dieback management in Western Australia and the proposal to prepare a comprehensive Dieback Strategy (Action 3.23) is strongly supported. The 'Dieback Working Group', established to protect bushland from dieback and develop and implement Codes of Practice, provides information and guidelines to Local Government and the community. It is recommended that the Dieback Working Group be involved in the development of a comprehensive Dieback Strategy. | Noted. |
| 200303270: Antoinette Torre | 5 | It is positive that the sustainability strategy states that plantations will play an important role in the future of timber production. The royalties on our native timbers must be at least doubled, recovery rates increased and logging rotations lengthened. It must be recognised that plantation trees are there to be harvested and that our native forest does not exist primarily to be logged. Our native forests are exactly that, Our Native Forests! It is arrogance to insist that these forests must be logged for industries to remain as they are. | Noted. |
| 200303074: Department of Conservation and Land Management (CALM) | Page 11, para 5 | Action 3.23 proposes the development of a dieback strategy to control the spread of <i>P. cinnamomi</i> throughout the south-west. While dieback is a serious threat to jarrah forests, it is not a threat that is specific to forest ecosystems; it also impacts significantly upon shrubland and woodland ecosystems in the south-west. In respect to the wider scope of the threat, it is recommended that managing the threat of dieback to biodiversity be addressed in the proposed section on sustainable biodiversity (see <i>CALM comments in Introduction section for this chapter above</i>). Objectives, action items and indicators/targets should be allocated to this issue accordingly. | The final Strategy further acknowledges the impact of <i>P. cinnamomi</i> on biodiversity values in Western Australia. See <i>Maintaining our biodiversity</i> . |
| 200302729: Shire of Serpentine- Jarrahdale | 6, pg. 11 | <i>Proposed Actions</i> There needs to be a timber certification system established that allows consumers to identify the timber source method of management and harvesting, type and age of timber. This will need to be done in coordination with the other states to ensure an integrated approach is taken Australia wide. WA could become leaders in the provision of sustainable management timber and this is a growing market. | The final Strategy places emphasis on accrediting the management of native forests and plantations to sustainability standards. |
| 200300358: F. Schnattler | | I vote for a revegetation program of native and plantation trees on cleared ex-native forest land, and an industrial logging stop until 2100. | The Government is supporting revegetation initiatives including the Forest Product Commission's INFINITREE program. |

Sustainable Forestry and Plantations *continued*

| | | | |
|-----------------------------|--|---|---|
| 200300358: F. Schnattler | | Do not consult with the community over the final boundaries on the 30 new National Parks in old growth forests. Instead of make the total area of these 30 parks significantly larger, ie. at least double it, and confiscate land if necessary for this purpose. | The Government is committed to consultation with the community over the final boundaries of the new national parks. |
|-----------------------------|--|---|---|

Sustainable Mining and Petroleum Production

| CIB # | Submission paragraph/ page # | Paragraph Text | Response |
|---|------------------------------|---|--|
| 200300401: Centre for Social Responsibility in Mining, University of Queensland | 4 | Re Action 3.27, there is a possibility that the proposed working group could duplicate work already underway within the minerals industry. The international Council of Mines and Metals (ICMM) is working towards producing a set of operating principles for the global mineral industry. In parallel, the Minerals Council of Australia (MCA), which represents all of the major players in the industry, has its own member committee working towards the same goal. Our understanding is that the MCA is about to commence work in earnest on broadening the current Australian Mineral Industry Code for Environmental Management to reflect for more fully sustainability issues. The minerals industry is likely to be reluctant to be involved in 'yet another process' to define operating principles that cuts across the MCA exercise. It is also important to avoid the emergence of competing frameworks in different jurisdictions, which might only further confuse stakeholders. | The final strategy indicates the development of Sustainability Operating Principles for the Mining and Petroleum Sectors. Clearly this initiative would need to be cognisant and take account of other similar approaches. |
| | 5 | Subject to confirmation from the MCA on its timetable, a more appropriate course of action might be to let the MCA process run its course and for the WA Government to seek to have input into the development of the proposed new Code. Once this Code has been finalised, consideration could then be given to whether it needs to be supplemented or modified to fit WA circumstances. (One issue here is that the junior exploration and mining sector is unlikely to have much involvement in the MCA process and so may not consider itself to have ownership of the outcomes.) | As above. |
| | 6 | Re Action 3.30, again, it would make sense to liaise with the MCA on this, as the proposed Code should provide a framework for accreditation in some form. | Noted. |
| | 7 | The more challenging issue, which is not really addressed in the strategy, is what to do with those companies – such as the junior miners – who are reluctant to participate in voluntary schemes. This may require some form of regulatory 'floor' to ensure that all companies meet at least minimum standards. The regulatory framework should also recognise, and reward in some way, those companies that are prepared to undertake voluntary accreditation. | The final Strategy suggests that Industry Sustainability Covenants may be one means of recognising voluntary efforts of companies towards sustainability that is 'beyond compliance'. |

Sustainable Mining and Petroleum Production *continued*

| | | | |
|---|----|---|--|
| 200302880 City of Wanneroo | 36 | The extraction of minerals is inherently unsustainable and should be recognised as such. It is agreed however, that sustainability principles can be used to make this process more socially, environmentally and economically more acceptable. | Noted. |
| 200311216: Zoe Moore | 42 | A paradox! Para 2 - rehabilitation post-mining? Not possible, healthy bush once cleared cannot be rehabilitated. No-one can profess to claim intimate knowledge of an eco-system or habitat. | Noted. |
| | 43 | 2 nd last para. Passing the buck onto consumption. Typical. | Noted. |
| | 44 | 1 st para. p113. not a comparable tradeoff | Noted. |
| | 45 | 3 rd para. Aboriginal training programs- atrocious. | Noted. |
| | 46 | <i>In short...</i> industries to set sustainability standards? Suspect | Noted. |
| 200300368: City of Kalgoorlie-Boulder | 22 | Long-term sustainability of mining areas requires the utilisation of abandoned mine sites for other alternative industries – eg: aquaculture. | Noted. |
| | 23 | The involvement of local shires as part of the sustainability assessment process is considered important due to the social impact of fly in fly out mining operations on the social and economic environment as opposed to the positive outcomes from integrating the company into the community. | The final Strategy includes a commitment to develop a protocol that establishes broad principles and procedures to facilitate communication and discussion between the Department for Industry and Resources and relevant local authorities in regard to projects of significance to the State, future State Agreements and variations to existing State Agreements. |
| 200300363: Eastern Metropolitan Regional Council | 49 | Although supported by the general community, the range of actions associated with this goal (Actions 3.26 to 3.31) are mostly relevant to the State Government and industry, who are best placed to provide comments of the actions proposed. | Noted. |

Sustainable Mining and Petroleum Production *continued*

| | | | |
|--|-------------|---|---|
| 200303162: Robin Chapple & Giz Watson, MLC's | 1, p. 4 | Given the central place in which the mining industry holds itself in the Western Australian economy, the draft strategy has surprisingly little to say about the future of mining. Brief mention is made of the MMSD (Minerals Mining and Sustainable Development) initiative, which is under attack from NGOs around the world, from Indigenous advocacy organisations to Friends of the Earth.... We recommend the Policy Unit considers reframing the debate in terms of how best to support communities with a high degree of reliance on unsustainable industries such as mining, rather than buying into the argument that extracting non-renewable resources is somehow sustainable. | Noted. |
| 200303069: Australian Petroleum Production and Exploration Association (APPEA) | 7, par. 3 | We also note that off-shore oil and gas project development and operations is not addressed in the Strategy. We recommend a uniform approach across state and commonwealth waters when drafting and implementing sustainable development strategy. | The final Strategy gives increased consideration to the role of the Petroleum Industry. See <i>Sustainable Mining and Petroleum Production</i> . |
| | 7, par. 5-6 | APPEA notes that the Strategy includes the priority area of Sustainable Mining and Petroleum Production under the goal of Sustainable Management of Natural Resources. However, this priority area does not include the oil and gas industry within the scope of proposed actions. We recommend that separately to the development of Sustainable Operating Principles for the Mining Sector, a set of Principles for the oil and gas industry are also developed. In considering how those principles are put into effect, the following diagram outlines a model that is not only suitable for oil and gas, but other industry sectors as well. The oil and gas industry has developed a number of effective models for implementing continuous improvement programs under a co-operative management structure. The same concept could be applied to sustainable development, if the principles are put to work under the umbrella of agreed industry specific sustainable development objectives. Those principles must be compatible with a globally accepted definition and principles of sustainable development. Prudent and practical sustainable development policy and principles should be based upon a framework of risk management. | See above. The final Strategy indicates that a set of agreed Sustainability Operating Principles would be developed for the mining and petroleum sectors. See <i>Sustainable Mining and Petroleum Production</i> . The proposed framework diagram is incorporated in the <i>Implementation</i> section of the final Strategy. |

Sustainable Mining and Petroleum Production *continued*

| | | | |
|---|--|---|---|
| 200303069: Australian Petroleum Production and Exploration Association (APPEA) | 9, par. 1-2 | <p>APPEA recommends the preferred approach to implementing sustainable development in W.A. is best achieved through government setting broad policy objectives (viz. the Strategy). In response to the policy objectives, each industry develops their own Sustainable Development Operating Principles, as per the previous point. Each enterprise will implement their industry Sustainable development Operating Principles relevant to its unique circumstances. Each case for sustainable development should be assessed on how a net benefit will be, or is being, delivered across the triple bottom line, according to its relevant industry principles.</p> <p>APPEA's members, for example, already successfully manage their business according to a similar process....</p> | The final Strategy supports the active leadership and involvement by industry sectors in the development of codes for or sustainability principles relevant to that sector. |
| 200303069: Alcoa | 4, p.8 | Despite the importance of this industry and the wealth, innovation and new technology it generates, the draft Strategy does not address how the support for this sector will continue in the future. In particular, the draft Strategy recognises that Western Australia is currently resource intensive, but does not contemplate what mechanisms will be provided to ensure industries such as Alcoa will be able to sustain their contribution to the economic, social and environmental health of the Western Australian community in the future. | The Government released a draft Industry Policy on 10 July 2003. |
| | 6, p.8 | Further, the draft Strategy outlines Sustainability Assessments and Reporting as the key indicator. While in Alcoa we view reporting as an important medium for performance management and communication with the wider community, we believe that the more tangible measures of sustainability that are available for the mining industry – such as financial contribution to environmental technology research and development, community-based employment and wealth creation, or rehabilitation of land for the community's beneficial use – are a better measure of the direct impact of the sustainability actions for this sector. | The final Strategy places increased emphasis on the implementation of international standards of sustainability reporting by industry as an indicator. See <i>Sustainable Mining and Petroleum Production</i> . |
| 200303074: Department of Conservation and Land Management (CALM) | Page 11, last para and page 12, first para | There is no recognition in the State Sustainability Strategy of the Government's policy on mining in national parks and nature reserves. Given that there are considerable mineral and petroleum interests on conservation lands managed by this Department and proposed conservation reserves, the State Sustainability Strategy should recognise the Government's policy to prohibit mineral and petroleum exploration and mining in national parks and nature reserves. Mining and petroleum activities impact on biodiversity conservation values, and therefore need to be subject to appropriate assessment and conditions. | Noted. |

Sustainable Mining and Petroleum Production *continued*

| | | | |
|------------------------------|-----------|---|---|
| 200300307: Hamersley Iron | 1, p.4 | <p>The vision is commendable, however the timeframe for achievement may be extremely long and, as identified in the report, is dependent on radical changes in consumer consumption. Minerals production and consumption is strongly linked to economic development, particularly in emerging countries, and in the medium to long term it is difficult to envisage a decrease or a plateau in the need for global resources.</p> | The vision statement has been amended to reflect an industry sector that underpins a sustainable global economy through continuous improvement. |
| | p.4 cont. | <p>Hamersley commends the State Government for its recognition in the consultation draft of the mining industry's extensive environmental management programs as well its the innovative and effective education and training programs for local Indigenous people.</p> <p>Hamersley requests that the following changes are made in the final version of report to the text that relates to HISMelt (page 112 and Box 25):</p> <p>Text on Page 112 – change the reference from HISMelt to HISMelt in the sentence "...Box 25 below sets out how the HISMelt process has created a long-term future for Pilbara iron ore. <i>Text Changes required to the Box 25 (new text in bold, text in strikethrough to be deleted)</i></p> <p>HISMelt technology is a globally innovative technology breakthrough from Rio Tinto developed in Kwinana. This technology has been researched and developed by Rio Tinto with support from Government over the past twenty years. The project was approved in late 2002 by the Minister for Environment and Heritage for full-scale application at a company owned plant in the Kwinana industrial area along the coast south of Fremantle.</p> <p>In terms of sustainability the technology is a breakthrough on several fronts. First, it enables vast areas of previously uneconomic high phosphorus iron ore to become economic, giving the Pilbara region a much longer lifetime as a producer of quality iron ore. Second, it is a fundamental change to how iron is produced with significant potential to reduce energy consumption and greenhouse gases.</p> | The suggested amendments have been incorporated in the final Strategy. |

Sustainable Mining and Petroleum Production *continued*

| | | | |
|------------------------------|---------------------|--|--|
| 200300307: Hamersley Iron | p.4 cont and p.5 | <p>The process combines a hot air blast system, ore pre-heater and vertical smelt reduction vessel to smelt a continuous ore/coal/flux feed into high purity iron ore without the use of coking ovens or sinter plants. The key innovation is the use of direct smelting rather than shaft furnace process, which greatly increases the range of suitable and economically viable ferrous feed stocks, due to its ability to separate impurities efficiently on a continuous basis. Phosphorous, which is captured in the pig iron in a traditional blast furnace and is an impurity for steelmaking, is no longer a hindrance. After a downstream sulphur removal stage, the end-result is a high-grade pig iron, which is highly sought after by steel manufacturers.</p> <p>The design of the plant will also allow for the capture of thermal energy produced in the smelting process that can then be used for energy production. This new efficiency is called a 'Factor-X' gain (a term used in industrial ecology to denote ecologically beneficial efficiencies in a production process that are gained through producing multiple products where formerly there was only one). In this case, the dual outcomes of iron production and energy means a much-reduced greenhouse gas output as compared to the production of these two commodities independently. This is a precursor to the next wave of production technology and regulatory requirements, which will eventually result in the retirement of older, less greenhouse efficient, stand-alone energy plants.</p> <p>The sustainability benefits of the HIs melt process are many. Locally, the Perth area gains a new industry and a value added technology. Regionally, both the Perth metropolitan area and the Pilbara benefit through the extended life of an industry that is of vital importance to both in terms of employment and economic stability. The State of Western Australia also benefits in a similar manner. At a National level, technologies such as HIs melt will be crucial to Australia's commitment to reduce greenhouse gases, as well as ensuring a role for this country in an emerging global market through the steady progression of agreements, such as the Kyoto Protocol.</p> | |
|------------------------------|---------------------|--|--|

Sustainable Mining and Petroleum Production *continued*

| | | | |
|---|-----------|---|---|
| 200303092: Housing Industry Association (HIA) | 1-2, p.12 | <p>It flies in the face of sustainability to have two systems of development assessment for land use in the State, as suggested in the part of this chapter related to mining.</p> <p>Western Australia should have a single system of development assessment. The assessment of major projects (such as Gorgon) and the use of State Agreements/ Agreement Acts, even after the Keating proposals, are not subject to an understood level of assessment by the community. The Government should integrate the major project assessment process with that of 'non-major' development assessment processes. This will enable all parties a better understanding of the processes and greater input into decision-making on major and other projects affecting the community and regions.</p> | The Government intends to establish sustainability assessment arrangements for complex or strategic projects as well as a 'Sustainability Scorecard' arrangement related to development control. See <i>Sustainability assessment</i> . |
| 200303443: State Development Portfolio | 109-113 | <p>More references to the petroleum industry are required in the document. This section also needs to recognise that whilst the mining and petroleum industries have the same principles and desired outcomes, they have very different extraction and processing procedures.</p> <p>Industry groups have also expressed concern at any additional regulatory overlay from sustainability adding unnecessary complication to the assessment process and increased business risk.</p> <p>It is important that the common sustainability standards that are already in use internationally (e.g. Global Reporting Initiative/ Sustainability Standards) are appropriately recognised in the Strategy, rather than a situation where a new set of standards is established (although there will be scope for developing complementary standards).</p> <p>It is also considered that the Strategy must give due acknowledgement to existing regulations that promote sustainable development such as the Safety Case and Environment Plan regulations for the petroleum industry.</p> <p>The Strategy should be directed towards a focus on the fundamental principles to guide the sustainable development of minerals and petroleum extraction and production, and the recognition of existing legislation and processes that are consistent with these principles.</p> | These matters have been addressed in the final Strategy. See <i>Sustainable Mining and Petroleum Production</i> . |
| 200302729: Shire of Serpentine- Jarrahdale | 7, pg. 11 | The current vision is from the view that mining will not have to evolve to more sustainable ways of doing business which incorporate reduce resource extraction over time. The future mining industry could incorporate reuse and remanufacturing of resources to reduce extraction required. The vision needs to look to a better future that is innovative and looks at the whole life cycle and solutions for closing the loop in resource use. | This is addressed in <i>Eco-efficiency and industrial ecology</i> . |

Sustainable Mining and Petroleum Production *continued*

| | | | |
|---|-----------|--|---|
| 200302729: Shire of Serpentine- Jarrahdale | 8, pg. 11 | <i>Objectives</i> the objective in the strategy is to achieve worlds best practice WA has the opportunity to go beyond this and be leaders in the field. | This is implied in the objective. |
| | 1, pg. 12 | Action 3.27 says to consider the GMI principals for mining. These have been developed by the key mining players worldwide and have been accepted internationally as a means for addressing sustainability in the sector. We need to commit to using these as a base framework and not moving away from the global movement and work that is being done but using this resource and expertise to best achieve sustainable mining in WA. | This will need to be considered in the development of the Sustainability Operating Principles for the Mining and Petroleum Sectors. |
| | 2, pg. 12 | Proposed Action: Provide guidelines and training on triple bottom line reporting within the mining industry. | Noted. |
| | 3, pg. 12 | <i>Indicators and Targets</i> Reduction in minerals extraction and increase in resource reprocessing | Resource reprocessing is addressed in <i>Eco-efficiency and industrial ecology</i> |
| 200300358: F. Schnattler | | Provide links on the website to these research centres. | Noted. |

Sustainable Tourism

| CIB # | Submission paragraph/ page # | Paragraph Text | Response |
|--|------------------------------|--|---|
| 200311216: Zoe Moore | 47 | <ul style="list-style-type: none"> • Urban sprawl in Hills? • End to logging? • Ningaloo? <p>How does the government propose to promote tourism of areas that they have exploited?</p> | Noted. |
| | 48 | p116 para 2. Indigenous interests acknowledgement not enough. | Noted. |
| 200300368: City of Kalgoorlie- Boulder | 24 | The indicators/targets for this section is very much growth orientated – sustainability of the resource (environment) has not been considered. Tourists can be extremely damaging to the natural environment, we need to have checks and balances present to ensure the resource is also sustainable. | The final Strategy emphasises the importance of protecting Western Australia's natural environment and a sustainable approach to all tourism development. |
| | 25 | 3.35 seems to contradict itself in that it is proposed to accredit a local government area as a way of demonstrating area-wide tourism sustainability – surely more than one local government would need to be involved for area wide sustainability. | In this case, area-wide is intended to coincide with a Local Government area. |
| 200300363: Eastern Metropolitan Regional Council | 50 | The EMRC supports the State's intent to facilitate nature based recreation and tourism and Western Australia's sense of place (Action 3.32). The EMRC has successfully undertaken this at a regional level and has developed a Regional Tourism Strategy and an eco-tourism guide for the eastern region of Perth. | Noted. |
| | 51 | Local Government is also likely to be a key stakeholder in further developing cultural tourism (Action 3.33), particular in this region which has a rich culture and significant natural resources. | Noted. |
| | 52 | The application of an appropriate accreditation to a Local Government area as a way of demonstrating area-wide sustainability (Action 3.35) is currently being investigated by EMRC based on the Green Globe model. | Noted. |
| 200303160: Goldfields Esperance Development Commission | Pg. 7 | This is an area of rapid expansion within our region and one that needs to be encouraged on a statewide basis with the trend towards eco-tourism and holidays and travel closer to home. The environment however needs to be maintained with this trend. | Noted. |

Sustainable Tourism *continued*

| | | | |
|---|-----|---|---|
| 200217802: Heritage Council of WA | p.4 | <p>We'd recommend strengthening the section on Sustainable Tourism on page 117 in Chapter 5, so that built heritage is addressed more specifically alongside nature conservation.</p> <p><i>Vision</i> Amend to read: Tourism continues to grow in Western Australia but becomes more and more a tool for the management of natural, cultural and indigenous resources; the repair and protection of the environmentetc</p> <p><i>Objective</i> No change</p> <p><i>Actions underway include</i> ADD: <ul style="list-style-type: none"> • Accreditation of Authentic indigenous tourism product is being developed in conjunction with the National Tourism Accreditation Program. </p> <p>Proposed Actions: ADD: Develop the State's Cultural Tourism Strategy (through the Tourism commission) and the Heritage Council of Heritage Tourism Strategy (through the Heritage Council) in a coordinated fashion.</p> <p>Indicators: Amend to read: Increasing numbers of accredited tourism ventures based on the natural, cultural and indigenous resources of Western Australia.</p> | The final Strategy has been amended to increase emphasis on cultural and Indigenous heritage tourism. |
| 200303443: State Development Portfolio | 117 | The opening quote in this section (p.115) by Lisa Clarke is unreferenced and the author is not known as a tourism expert. This does not lend credibility either to the statement or the section. A quote by a recognised expert would be more appropriate. | A quote from David Suzuki has been added to this section. |

Sustainable Tourism *continued*

| | | | |
|---|--------------------------------------|---|--|
| <p>200303443: State Development Portfolio</p> | <p>118, 120-122, 124-126</p> | <p>The Strategy appears to confuse the terms nature based tourism, ecotourism, and sustainable tourism. This is, however, to be understood given the findings of a recent World Tourism Organisation report on research commissioned into the perceptions of people in a number of countries regarding use of this terminology. ...</p> <p>Mr Michael Rowe of the Department of the Premier and Cabinet briefed the Nature Based Tourism Advisory Committee in December 2002 regarding the comments made at a public workshop addressing sustainable tourism. It should be noted that the majority of the people attending the workshop were not from the tourism industry and these comments should be viewed accordingly.</p> <p>The Nature Based Tourism Advisory Committee is a subcommittee of the Board of the Western Australian Tourism Commission (WATC). The Advisory Committee highlighted that the Strategy as a whole does not recognise the fact that financial decisions made elsewhere in the world by large corporations and Governments may have a greater impact on the sustainability of the country than internal Government decisions.</p> <p>Many of the report's recommendations call for a high level of Government intervention, which is against the philosophy seeking the development of partnerships between government and the private sector to develop appropriate actions.</p> <p>At the end of the sustainable tourism section a number of background papers are cited as references. These papers have not been subject to peer review; contain information that is erroneous; and are not of a quality or standard that is fit for referencing in a Government publication. Individuals have also been quoted without their permission, which may be viewed as being unethical.</p> <p>The vision statement in the section (page 117) is not aligned with the State's identified tourism development strategy which is: "To make Western Australia the World's natural choice." In addition, the vision statement has the underlying assumption that nature based tourism is the only kind of sustainable tourism, which is a very narrow definition.</p> <p>The objective listed is limited in scope and unmeasurable. The WATC has a number of objectives which underpin the State's tourism vision.</p> | <p>These comments have been addressed in the final Strategy.</p> |
|---|--------------------------------------|---|--|

Sustainable Tourism *continued*

| | | | |
|---|---------|--|---|
| 200303443: State Development Portfolio | 127-131 | <p>In the Action Items Underway it should be made clear that the existing accreditation programs include all tourism businesses, not solely those that are nature-based.</p> <p>In terms of the Proposed Actions it should be noted that the WATC is already giving effect to all of these proposals. There is, however, a need to clarify each of the points.</p> <p>Action 3.32 places undue emphasis on nature based tourism. It should also be noted that the marketing of nature based tourism is already being carried out through the "Be Touched by Nature" campaign. It is also unclear why there is such a strong emphasis in this action on walk trails specifically, when there are many different tourism activities that should be marketed. The concept of "sense of place" should also be clarified and explained in respect of this action.</p> <p>For Action 3.33, a cultural tourism strategy is already being developed for WA and this will address many of these issues. In terms of this action there is a danger in making such prescriptive statements regarding the kinds of businesses that should be developed, as some of the proposed activities may not be viable at this stage. For these activities the term "sense of place marker" must also be explained and referenced.</p> <p>Action 3.34 is supported in principle, however, there are a number of practical implications and issues that may hinder the pursuit of these actions. The range and application of existing nature-based and sustainable tourism accreditation programs for operators (especially small operators) is confusing as they are clearly not applicable to particular industry segments. ...(more details on accreditation – see document)</p> | These comments have been addressed in the final Strategy. |
| | 136-137 | <p>With respect to Action 3.35 it should be noted that the Green Globe Accreditation for Local Government has received a mixed response in Western Australia and other parts of Australia. In principle the benchmarking of a range of key environmental indicators is a commendable concept for Local Government areas and the differentiation achieved by completing the accreditation for an area is extremely attractive. However, the program currently has a number of issues which need to be considered including: ...</p> <p>The indicators and targets and the global opportunities as outlined in this section should also be modified in keeping with the above comments.</p> | Noted. |

Sustainable Tourism *continued*

| | | | |
|---|------------|--|--|
| 200302729: Shire of Serpentine- Jarrahdale | 4, pg. 12 | Acknowledge that some areas of WA are too valuable to be accessed for tourism and should be protected for biodiversity. These areas will need to be identified and protected through legislation. | The final Strategy contains increased emphasis on the importance of preserving the natural environment. |
| | 5, pg. 12 | If WA is to be marketed as a nature based tourism destination there needs to be education and awareness of the issues associated with what they are experiencing and how to protect it. | The final Strategy contains increased emphasis on the importance of educating visitors to reinforce sustainability values. |
| | 6, pg. 12 | Training needs to be provided to operators on the best ways to operate sustainable tourism and manage the impacts they are having. | Noted. |
| | 7, pg. 12 | For sensitive areas accreditation guidelines and system need to be developed before operators can take tourists there. The carrying capacity of tourism areas needs to be identified to ensure that only that number of visitors access the places. | Noted. |
| | 8, pg. 12 | There is a balance between allowing people to experience a place and its long term survival that needs to be considered. | This is reflected in the final Strategy. |
| | 9, pg. 12 | There is great potential for sustainable tourism as opposed to eco-tourism. WA has large sectors such as mining which tourists would like to view, there are many opportunities related to educating tourists on WA sustainability initiatives | This is reflected in the final Strategy. |
| | 10, pg. 12 | Action 3.34 Accreditation is essential especially as sustainable tourism becomes the 'trendy' thing. There needs to be an identified state government agencies responsible for managing the accreditation process which would incorporate training and monitoring. | Noted. |
| | 1, pg. 13 | Proposed Actions: There needs to be a strong community input to tourism operations. There needs to be a mechanism built in that allows local communities to assess potential tourism operations for the impacts they will have on the physical and social environments. | Noted. |

Protecting Aquatic Systems

| CIB # | Submission paragraph/ page # | Paragraph Text | Response |
|---|---------------------------------|--|----------|
| 200219350: Leschenault Catchment Council | 9 | The management of the States remaining wetland systems should be developed in the context of ecologically sustainable development consistent with the principles outlined in the <i>State Wetland Conservation Policy (1997)</i> , System 6, <i>Environmental Protection Policy (EPP)</i> and environmental best management practices. | Noted. |
| | 10 | The strategy describes a need for the identification of environmental values and designate environmental quality objectives and classification criteria for the protection of aquatic systems. This work has already been completed and has so for some time. A classification system developed by the Semenuik Research Group has already been developed and employed for the classification of wetlands on the Swan Coastal Plain. This classification has been adopted and actively applied in land use planning by the Water and Rivers Commission (WRC). Management objectives based on this classification system are described in the WRC Position Statement: Wetlands (2001), which is inclusive not only of wetlands, but of important river and estuarine systems. However, those wetlands not identified under EPP are not afforded any legislative protection. With an estimated 80% of 'Conservation' category wetlands on the Swan Coastal Plain already lost through development pressures, the need for legislative protection is required with some urgency. The formalisation of protection for 'Conservation' and 'Resource Enhancement' wetlands, and System 6 areas under the <i>Environmental Protection Act 1986</i> , and amendments to the <i>Waterways Conservation Act 1976</i> , including increased penalties, should also be addressed as a matter of urgency. | Noted. |
| | 11 | While the strategy acknowledges that the process has commenced to develop Environmental Protection Policies for aquatic systems, the destruction and decline of these conservation, community and scientific assets requires more urgency in regard to putting these protective mechanisms in place. | Noted. |
| 200217800: Michael Bell | 30 | 3.36 Triple bottom line decisions can be implemented now but agencies refuse to do so! | Noted. |
| | 31 | Regarding Action 3.37, Where is the required involvement of local government in this process? | Noted. |
| ? | 20 | Re Action 3.40, note that the City strongly supports the Armadale Gosnells Landcare Group which is undertaking catchment management. | Noted. |

Protecting Aquatic Systems *continued*

| | | | |
|------------------------------------|----|--|---|
| 200300359: Bernhard Bischoff | 3 | I have a specific concern about the damage done to aquatic systems and wetlands of the Swan Coastal Plain by engineering solutions when there is seasonally a high water table. How many urban wetlands on the coastal plain are threatened by salinity? Engineering solutions to wetlands or their periphery appear not always assessed sufficiently for their long term effect and probably not monitored either, yet the threat of salinity is very real as an example in Bunbury shows. | Noted. |
| | 3 | At Hay Park, Bunbury there is a well-vegetated wetland which in its western part shows signs of incipient salinity. The hydrology of this wetland was affected by at least four events: the deviation towards the ocean of the upper 5-Mile Brook, channelling of the brook into a deep drain, removal of trees in anticipation of further alienation of the wetland, and the filling of other parts of the wetland to create playing fields. Do we have to wait until this wetland with its unusual communities is beyond repair before remedial action is taken. At the same time millions of litres of highly treated wastewater, which could possibly be used to re-dress the water balance, are pumped into the ocean only 3 to 4 km away. | Noted. |
| 200302880: City of Wanneroo | 37 | The definition of aquatic is unclear, with the draft strategy appearing to focus more on land based wetlands than marine and semi-marine areas such as estuaries and coastal fringe. In this regard it may be more appropriate to use the terminology of ' <i>Inland Water</i> ' as used in the State of the Environment reports. A whole of catchment approach to use and management should be encouraged. | The final Strategy more clearly defines aquatic systems to include wetlands, rivers, estuaries. |
| | 38 | To complement the River Restoration Manual the Water and Rivers Commission should develop its proposed Wetland Restoration Manual. | This is reflected in the final Strategy. |
| 200311216: Zoe Moore | 49 | GLOBAL WARMING- a reflection of our lifestyles, primary industry, agriculture, mining and land clearing. These practices must be halted. | Noted. |
| | 50 | p119, paragraph 3 'Poorly understood by the general community and undervalued as a consequence'! How about govt mismanagement- logging in catchments, mining etc? | Noted. |
| | 51 | <i>In short...</i> Degradation and decreasing quality well acknowledged but does the response match the gravity of the problem? | Noted. |
| | 52 | Regarding bullet point 4: How about protecting all wetlands entirely? | Noted. |

Protecting Aquatic Systems *continued*

| | | | |
|--|--------|---|---|
| 200311216: Zoe Moore | 53 | <i>Proposed actions</i> 3.4 , but logging in catchments- as in hills continues to occur. And what about urban developments? | Noted. |
| 200302959: City of Fremantle | 19 | The proposed actions for protecting aquatic systems are still unspecific in terms of actual actions. For example, proposed action 3.36 states “protect water dependent ecosystems while allowing for the management of water resources for their sustainable use and development to meet the needs of current and futures users” but does not state how this will be achieved nor who will be responsible to do this. The same applies for proposed actions 3.37, 3.38, 3.39, 3.40, 3.43 and 3.44 and all need to be reworded to state exactly how such actions will be achieved. | The proposed actions have been significantly re-worded in the final Strategy. |
| 200301473: North Lake Residents Association | 2 3 | Many people are filled with awe and respect when they view the Australianess of such places as the Beeliar Wetlands. This is partly because its simplicity suggests there is so much more to it than meets the eye. Its complexities, its flora and fauna, its aesthetic qualities, its links with indigenous culture and its value as public amenity for physical and psychological recreation are only just beginning to be understood... This area is currently under threat from a proposed extension of the Roe Highway stage 8. | Noted. |
| 200300368: City of Kalgoorlie- Boulder | 26 | The seasonal aquatic systems also need to be protected and the impact of the development on this system needs to be assessed, for example Gribble Creek in Kalgoorlie-Boulder, highlighting the need for aquatic protection in arid areas. | Noted. |
| 200300363: Eastern Metropolitan Regional Council | 53 | The EMRC generally supports the actions to protect aquatic systems, however, consideration of water quantity objectives and catchment management issues need to be included in Action 3.38. | Noted. |

Protecting Aquatic Systems *continued*

| | | | |
|--|----|---|--|
| 200300363: Eastern Metropolitan Regional Council | 54 | Ensuring that activities in the catchments are actively managed through management, community partnerships and legislation (Action 3.40) is a particular action that the EMRC and the member Councils have an active interest. The EMRC coordinates the Eastern Hills Catchment Management Project (EHCMP), which received the 2001 Premiers Award for Excellence in Public Sector Management (Sustainable Environment category). In developing and implementing this project over a five (5) year period, the EMRC has a thorough understanding of issues associated with catchment management in an urban context and can assist the State Government in identifying measures to improve existing arrangements related to Natural Resource Management and the Natural Heritage Trust. | Noted. |
| 200303065: City of Gosnells | 37 | Specific reference must be made to the biodiversity values of aquatic ecosystems. Similarly, no mention is made of ecotourism potential or biodiversity exploitation. | The Strategy contains increased emphasis on the biodiversity values of aquatic systems. |
| | 38 | Actions under way and proposed actions focus on aquatic systems, but fail to recognise in depth the integral relationship between catchments and aquatic ecosystems. Catchment management must be identified and addressed, beyond proposed action 3.40, as crucial to the protection and maintenance of aquatic ecosystems. In addition, proposed action 3.37 must also consider cumulative impacts in addition to individual impacts. | The Strategy contains increased emphasis on the importance of catchment management. |
| 200301547: City of Cockburn | 9 | In the "Protecting Aquatic Ecosystems" section, one of the proposed actions is to manage the water resources for their sustainable use and development. Who assesses the sustainable use level? | The Department of Environment is responsible for assessing and allocating water resources. |
| | 10 | This section also discusses assigning Environmental Quality Objectives to wetlands and embedding these objectives within Environmental Protection Policies (EPP). This is a useful management tool in some instances but does not recognise the high level of management many remaining wetlands (particularly in the City of Cockburn) are subject to. The ecological value of the wetlands and the current threats are well known, what is necessary is assistance to ameliorate the threats from such activities as urban drainage emptying directly into a wetland. Assistance is required where water treatment and / or changes to drainage design in established suburbs is necessary. Putting this responsibility solely on Local Government through EPPs would prove a significant financial burden. | Noted. |

Protecting Aquatic Systems *continued*

| | | | |
|---|-----------|---|------------------------------------|
| 200304379: DEWCP | 19, par 1 | The draft State Sustainability Strategy should put greater emphasis on the necessity to take a holistic approach to water resource protection (for the environment), as noted in the National Water Quality Management Strategy. | This is reflected in the Strategy. |
| | 19, par 4 | Comments on vision and objectives: It is noted, however, that a cultural change in our manner of water resource management would be required for this to happen | Noted. |
| | 19, par 6 | <i>"The State Water Quality Management Strategy is being developed" for implementing the National Water Quality Management Strategy in Western Australia.</i> This comment is true but it needs clarification. Only one document (Framework for Implementation) has been produced in May 2001. That document reiterated much of the policies and principles of the NWQMS and outlines each Government Agency's responsibilities in WA and how all agencies would interact. Reference is also made to community and local Government involvement. | This is reflected in the Strategy. |
| 200303165: Swan Catchment Council | 4, p.2 | The sustainability of the rivers and wetlands of the Swan Coastal Plain given urban expansion has been touched on but not explored and this leads to the biggest frustration of the document – the inability to see if enough research has been considered to draw the conclusions. | Noted. |
| 200302729: Shire of Serpentine- Jarrahdale | 2, pg. 13 | The proposed set of actions will require strong partnerships between state and local government and the community to achieve. | Noted. |

Protecting Aquatic Systems *continued*

| | | | |
|---|---------|---|---|
| 200303443: State Development Portfolio | 138-143 | <p>This issue (p.118) must be considered from a more strategic perspective recognising the linkages that exist with other Landcare programs and the Salinity Strategy. An important issue that must be addressed in this section relates to the identification of environmental values and designation of environmental quality objectives for all of the State's aquatic systems, so that these values can then be embedded within environmental protection policies.</p> <p>An emphasis on community education and stakeholder engagement is also critical to achieve the aims relating to protection of the State's aquatic systems.</p> <p>The introduction to the section also needs to focus on the issues associated with addressing requirements for integrated catchment management.</p> <p>The reference in the vision for the section to community-derived values is also unclear, as this will cover a range of areas and interests including environmental, agricultural, industrial, recreational and scenic values. Whilst the management of these values can be partially achieved through the use of Environmental Protection Policies and Statements of Planning Policy, there will also be other mechanisms that are required to achieve these aims.</p> <p>The material listed in the actions underway should also note that there are a range of Landcare programs that are aimed at catchment protection and improving aquatic waterways.</p> <p>The proposed actions in this section are supported. In terms of the first two actions relating to water dependent ecosystems and ensuring the values of aquatic systems are accounted for, it is noted that they take a sustainability approach that is not reflected in the vision and objectives of the section.</p> | These comments are reflected in the Strategy. |
| | 144 | In recognition of the importance of the issues associated with habitat loss as highlighted in the Strategy, it is recommended that the suggested actions should include development and implementation of programs to enhance these habitats using community/NGO involvement and available funding/grants for education initiatives. | Noted. |

Sustainable Coastal and Marine Environments

| CIB # | Submission paragraph/ page # | Paragraph Text | Response |
|-------------------------------|------------------------------|--|--|
| 200300348: City of Bunbury | 36 | The development and formulation of a specific over arching Planning Act, which incorporates both strategic and statutory development planning as well as environmental and coastal issues for Western Australia is seen as imperative. | The Government is committed to providing a more integrated approach and delivering more sustainable outcomes for coastal areas through the establishment of a Coastal Planning and Coordination Council to lead a robust, integrated, coastal planning and management system in Western Australia. |
| | 37 | Such legislative amendments to develop such an Act would strengthen the planning responsibilities and powers of local government and State agencies in their decision making process in regards to local planning and coastal issues, which would still ultimately be governed by the State in accordance with national legislation. At present there is no clear framework or State based legislative approach to coastal management and planning issues. | See <i>Sustainable coastal and marine environments</i> |
| | 39 | The establishment of a specific Planning Act which was not limited to, but incorporated both strategic, statutory, coastal and environmental issues would allow for clear and agreed objectives to be included in the guidance provided for the assessment of cumulative impacts. In a number of cases the current structural arrangements are not easily understood and the development of an over arching Act would in the long term minimise confusion over state, regional and local planning issues. | See above. |
| | 40 | In the interests of a coordinated approach for appropriate environmental protection and sustainable development there is merit in developing a state based legislative approach that could be enforced by local government's through the Western Australian Planning Commission. The benefits in this would be that local governments are best suited to consult with the local community. An elected Council ultimately makes local planning decisions, as the local community representatives. The development of a combined formal legislation will bring coordination and integration amongst all the stakeholders, as well as involve the community at the local planning level regarding local issues. The development of an overarching framework would also allow for greater transparency. Such an Act would seek to combine existing legislations and policies to minimise any duplication within the current planning system. | See above. |

Sustainable Coastal and Marine Environments *continued*

| | | | |
|---|----|---|---|
| 200302856: City of Stirling | 14 | Coastal planning can contribute to a sustainable coastal environment by reducing point source discharges and ensuring that non-point source discharges such as stormwater from roads carrying heavy metals are treated through natural bio-filtration systems prior to discharging into the sea (p 123). Bio-filtration systems could include vegetated areas, swales and stormwater retention ponds. Local authorities are the providers of infrastructure and therefore play an important role in the inclusion of natural resource sensitive urban design into development projects. The draft Strategy should address these issues in more detail and provide some examples of where these types of actions have been successfully implemented. <i>This action is generally supported.</i> | Noted. |
| 200311216: Zoe Moore | 54 | 'representative' para 5, p123. Who decides what is 'representative' and why don't the public have input into whether they believe that this is enough? | Noted. |
| | 55 | 'Sensible coastal development t' para 6. The proposed marina and development at Maud's Landing could not possibly be considered sensible for the reasons given by various environmental organizations, TWS in particular. | The Government has recently rejected the marina-style resort at Mauds Landing after considering advice from the Environmental Protection Authority and the independent Appeals Committee. |
| 200300201: Pearl Producers Association | 9 | We would strongly recommend that any consideration of using a similar regional council mechanism (as suggested on p124) for marine based consultation will require specific regional councils with suitable marine expertise. | The Government has announced that it will establish a Coastal Planning and Coordination Council. |
| | 17 | <i>"To offer the best chance of preserving all components of ...marine biodiversity in perpetuity....need comprehensive....secure marine protected areas. In the interim areas of high conservation significance must be identified and protected from threatening activities"</i> (p123). There is no mention of how to identify ' all ' components of marine biodiversity, how to protect it and how to measure the effectiveness of the protection. | Outside the scope of this report. |
| | 23 | We also support as a priority proposed action 3.5... However these strategies should clearly incorporate existing fisheries management approaches with responsibility for implementation through the Department of Fisheries under the guiding principles of the strategies. | Noted. |
| 200300363: Eastern Metropolitan Regional Council | 55 | Although supported by the general community, the range of actions associated with this goal (Actions 3.45 to 3.50) are mostly relevant to the State Government, who are best placed to provide comments of the actions proposed in consultation with key user groups, industry and the community. | Noted. |

Sustainable Coastal and Marine Environments *continued*

| | | | |
|---|--------------------|--|---|
| 200303074: Department of Conservation and Land Management (CALM) | Page 12, para 2 | There is overlap in the draft State Sustainability Strategy between the two priority areas, <i>Sustainable Coastal and Marine Environments</i> and <i>Sustainable Fisheries and Aquaculture</i> . The fisheries and aquaculture section focuses on sustaining the State's fish resources, however, it also includes components on the protection of marine biodiversity and the establishment of marine parks and reserves. While marine parks and reserves do assist in protecting fish resources, their primary purpose is to ensure that the conservation values of marine environments are maintained and protected. It would be more appropriate for objectives, actions and indicators related to protecting marine biodiversity and establishing marine reserves to be allocated to the section on sustainable coastal and marine environments. | Noted. |
| 200303160: Goldfields Esperance Development Commission | Pg. 7 | This is of vital importance to our region and being addressed in Esperance. | Noted. |
| 200304005: Marine Parks and Reserves Authority | 2 | The Authority is of the view that its vision for the marine environment should be included in the vision provided on page 125 of the Strategy. The Authority's vision is as follows: <i>"Healthy, sustainable marine and estuarine ecosystems"</i> | This has been reflected in the final Strategy. |
| | 3 | Objectives The Authority is of the view that an objective should be added for marine planning and suggests the following. • Establish effective marine planning throughout all State waters (fresh, marine & estuarine) to enable appropriate freshwater, marine and estuarine biodiversity management, such as in process in the terrestrial environment. | This has been reflected in the final Strategy. |
| | 5 | The Authority is concerned about the suggestion that for many of the actions it is proposed that protection of societal and environmental values be undertaken through instruments of State planning policies (SPP's) which are merely a relevant consideration which often can be ignored if appropriate. For many such values the Authority is of the view that there needs to be rigorous legislative backing to ensure the proper protection and management of those values. As a result, the Authority is of the view that the SPP's suggestion is inappropriate as a sole solution. The full suite of mechanisms available at law and as policy should be considered to protect the values once the actions are specified. | Agreed. This is reflected in the action to develop a State Coastal Strategy and State Marine Planning Strategy. |

Sustainable Coastal and Marine Environments *continued*

| | | | |
|---|-----------|--|---|
| 200304005: Marine Parks and Reserves Authority | 8 | As a result, the Authority recommends the following as additional actions on pages 125/126: <ul style="list-style-type: none"> • Ensure the Marine Park and Reserves Authority is properly resourced to enable it to discharge its functions under the CALM Act, particularly with respect to the creation of a comprehensive, adequate and representative marine reserve system; • Work with Commonwealth for regional marine planning beyond 3 nm to ensure effective and integrated marine planning and adequate, comprehensive and representative marine planning. • For government to urgently review the three ministers concurrence process and to actively pursue a mechanism to solve such issues to successfully allow speedier creation of a comprehensive, adequate and representative marine conservation reserve system. | Noted. Agreed. Noted. |
| | 9 | Indicators and targets <ul style="list-style-type: none"> • Dot point two should read: "Proportion of the State's marine ecosystems with designated ecosystem-based management plans." Ecosystem-based management is a sustainable system incorporating social, cultural, economic and ecosystem values and is now in process of adoption internationally and nationally. This should be followed through in dot points one, three and four. | This is reflected in the final Strategy. |
| 200303443: State Development Portfolio | 145, 147 | As noted earlier the proposed action items in this section (p.125) need to use clear definitions and terminology to ensure a common understanding and agreement as to what is intended. The proposed actions need to include social and economic parameters to be representative of the truly sustainable approach to the consideration and planning for coastal and marine systems. | Noted. |
| 200302729: Shire of Serpentine- Jarrahdale | 3, pg. 13 | <i>Vision</i> That the coastline is protected from over development through planning policies and legislation. | Noted. |
| | 4, pg. 13 | <i>Proposed Actions</i> A Planning Policy and necessary legislation is implemented to control planning along the WA coastline, particularly within the Perth region to ensure that the coastline is not overdeveloped impacting on the social and physical environment for current and future generations. | This could be considered as part of the development of the State Coastal Strategy and Marine Planning Strategy. |

Sustainable Rangelands Management

| CIB # | Submission paragraph/ page # | Paragraph Text | Response |
|---|------------------------------|--|--|
| 200302784: Roebourne-Port Hedland Land Conservation District Committee | 1 | When discussing Agricultural land there needs to be clear delineation between pastoralism and farming. While having some common aspects the differences are far greater as are the impacts on the natural resource. | Noted. |
| | 4 | As responsible land managers, the pastoral sector has a vital role in both the sustainability of ecological systems and as a small and vibrant contributor to the sustainability of the State's economy. It should also be recognised that the Pastoral industry adds an extra dimension to the economies and culture of regional areas which are often heavily reliant on the mining sector. | This has been reflected in the final Strategy, particularly through the vision statement for the <i>Sustainable Rangelands Management</i> section. |
| | 5 | One of the shortfalls of the SSS is that it appears to consider the pastoral industry almost in isolation. The industry is inextricably linked to the economic, social and environmental fabric of the regions in which it exists. As such, there needs to be two-way interaction between the sector, other industry and the wider community. | Noted. |
| | 7 | While Land Conservation District Committees provide a framework for dealing with land conservation issues at a local level there is a need for the impact of other industry and community activity to be considered. The Sustainability Strategy would be strengthened by providing a framework by which the LCDCs have the ability to participate in wider community decisions on developments that affect the sustainability of pastoral ecosystems. Furthermore LCDCs have played a pivotal role in developing integrated land management beyond an individual property's boundary and the Sustainability Strategy should attempt to build on the partnerships developed with Development Commissions, FESA and CALM to better manage resources eg. Pilbara Fire Management Plan. | Noted. |
| 200311216: Zoe Moore | 56 | <ul style="list-style-type: none"> What about the State's stance on GM, monoculture (traditional) agriculture? Last para; 'out of how many leases altogether saved for conservation? Box 27. no paradigm change though No mention of insecticides, organic, permaculture, GE? Last para: and? Response to these challenges? Feral animals etc | Noted. |
| 200303139: Kimberley Development Commission | 5 | The lack of mention of the impacts and necessary strategies to manage fire. This is an especially important issue for the Kimberley as the impacts of fire management is now emerging as regionally significant. | The impact of fire is mentioned in the final Strategy in relation to biodiversity management. See <i>Maintaining our biodiversity</i> . |

Sustainable Rangelands Management *continued*

| | | | |
|---|----------|--|--|
| 200300368: City of Kalgoorlie- Boulder | 28 | Land Administration Act needs to recognise environmental and sustainability issues, not just administration and industry concerns | The Pastoral Lands Board is charged with ensuring that pastoral leases are managed on an ecologically sustainable basis. |
| 200300363: Eastern Metropolitan Regional Council | 56 | The actions associated with this goal (Actions 3.51 to 3.56) are mostly relevant to the State Government, who can provide comments of the actions proposed in consultation with key stakeholders and pastoralists in the areas identified. | Noted. |
| 200303443: State Development Portfolio | 148-149 | <p>This section (p.127) needs to be more comprehensive and to establish a clear definition of the rangelands (i.e. is it just pastoral areas or does it include the broader, more widely accepted definition including arid, desert areas?). If this is the case, the focus of the discussion needs to be altered accordingly.</p> <p>As a more general point, it is also suggested that the vision statement should be shortened with a large amount of the material transferred to the list of objectives in the section. The vision statement should include commitments towards more diversification of land use within pastoral lease boundaries and ensuring that the needs and aspirations of aboriginal communities are met.</p> | The vision statement reflects the need for diversification of enterprises in the rangelands. |
| 200303425: Fire and Emergency Service Authority of WA | 6, pg. 4 | Agencies of the State and Commonwealth Governments need to be cognisant that managing the Unallocated Crown Land, from a fire perspective, is the responsibility of FESA and accordingly needs to be represented on any future review as proposed on page 129 dot point 3.53. | Noted. |
| 200303073: Natural Resource Management Council | Point 13 | For example, the rangelands section talks about forming a rangelands committee of NRM Council to identify key issues, and then lists other specific actions. It may be better to prepare a strategic plan of soil types, possible uses, conservation areas, etc to guide decisions on what areas should be retained for pastoralism, conservation, other industries, etc. | The Minister for Planning and Infrastructure established a number of working groups to consider issues associated with the future management of the rangelands. |
| | Point 15 | Council members believe the way we manage a large proportion of the rangelands does not appear to promote sustainability. There is doubt amongst members that the community has the capacity to use it and manage it sustainability. The size of the rangelands and its issues warrants more coverage in the Strategy. | Noted. The Minister for Planning and Infrastructure established a number of working groups to consider issues associated with the future management of the rangelands. |

Sustainable Rangelands Management *continued*

| | | | |
|---|---------|---|--|
| 200303443: State Development Portfolio | 151-153 | <p>Information and statistics are also needed to support the claims made regarding rangelands degradation.</p> <p>The recognition of mining lease rehabilitation and related protection measures is also an important issue in respect of effective rangelands management and accordingly should be discussed in this section.</p> <p>It is also noted that the proposed indicators have a conservation focus and they should be diversified to include consideration of other matters such as social sustainability and indigenous community issues.</p> | <p>This information is available from other Government documents.</p> <p>Mine site rehabilitation is canvassed within <i>Sustainable Mining and Petroleum Production</i>.</p> <p>All indicators and targets have been removed from the final Strategy.</p> |
| 200300358: F. Schnattler | | Establish a Rangelands Working Group consisting altogether of ten community, government and industry members to work out a comprehensive vision for the rangelands and advise all stakeholders of the objectives requiring consideration in the daily decision-making processes | The Natural Resource Management Council has established a Rangelands Working Group. |
| | | Comment: Provide information to the community state-wide about the Statement of Planning Policy on Sustainable Rangelands Management (Utilisation). It is a very important educational tool as it confronts the community with envirotive conditions that demand extraordinary individualistic and organisational survival knowledge and skills. | The Minister for Planning and Infrastructure established a number of working groups to consider issues associated with the future management of the rangelands. Reference to a possible Statement of Planning Policy has been removed. |
| | | Provide funds of AUD \$ 2,500,000 over the next ten years to universities to do more research and teaching on rangeland BEvolution in recognition of its societal significance to the state. Review and enhance the universities actionship and dialogship annually. | Noted. |

