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Sustainability Policy Unit
Department of the Premier and Cabinet
197 St Georges Terrace
PERTH WA 6000

THE WESTERN AUSTRALIAN STATE SUSTAINABILITY STRATEGY
Submission by the Urban Bushland Council of WA Inc

General Comment

1. The Urban Bushland Council of WA (UBC) recognises the Government's initiative in producing a Sustainability Strategy for the State. However we find the Strategy very disappointing and believe it should be substantially revised. The UBC believes that the Strategy does not address the key issues affecting our future or that any real progress toward sustainability would be achieved.
2. The Strategy deems to miss the fundamental appreciation that sustainability is all about sustaining life (in which humans are a small part) and life support systems in balanced cyclic systems of nature over the long term. Our current human activities in WA are on a linear path of degradation and are seriously out of balance with nature. Humans and healthy societies are *totally dependent* on the functioning of healthy cycles of nature. It is these healthy cycles of nature that we must restore.
3. The Strategy is very anthropocentric and is dominated by a wealth creation and business as usual agenda. The natural environment is described only in terms of biodiversity and sits under a mindset of economic prosperity. This is totally unacceptable and indicates a mindset of almost complete denial about the real environment, in which we are privileged to live, its unique values and its fragility. It also denies the incredible destruction we have imposed on the WA landscape in just 200 years.
4. The key issues of:
 - Maintaining biodiversity and health ecosystem processes,
 - Climate change and
 - Reducing Greenhouse Gas emissionsare treated superficially and actions suggested will achieve little.
5. The section on biodiversity is remarkably weak and this is a matter of great concern to us. UBC believes it needs to be completely rewritten by persons with the appropriate expertise in the natural resource agencies. Biodiversity is in the chapter on global sustainability yet other issues such as aquatic systems and coastal and marine issues are in a different chapter on sustainable use of natural resources.

6. A rigorous basis of fact and scientific information in any form to underpin the key issues is remarkably void. For example a summary analysis of the existing state of biodiversity and health of our natural ecosystems, of Greenhouse emissions over the last 10 years, history and projections of energy use, and expected climate change for WA should be included. This information is fundamental to public understanding of the issues and to measures necessary for remediation. The EPA's Preliminary Statement No6 'Towards Sustainability' is a much better document in its description of the key issues.
7. Many activities and actions described throughout the document are minor issues and detail and are not strategic. These unimportant discussions fill out the document, and key issues are buried amongst them in long sections making it difficult to follow. Such poor presentation indicates a fundamental lack of understanding of the large-scale strategic issues.
8. The structure, presentation and layout of the document are poor, making it difficult to read. It is far too long. The document does not confine itself to overall strategic issues, indeed it has avoided most of them by swamping the text with anecdotal detail and irrelevant material. The ecological interrelationships of the key issues are not addressed or inadequately so. For example the profound consequences of unmitigated climate change on our unique biodiversity and rural landscapes and wetland ecosystems is not covered.
The grouping of key issues is inconsistently arranged in chapters. Refer comment (5) above. Placing Biodiversity issues in the global sustainability chapter indicates that it may not be taken seriously as a State issues and notably it is omitted from chapter 5.

Specific comment:

Maintaining our biodiversity (p80)

1. The UBC supports the goal as stated on top of p80
2. The UBC recommends that persons with a greater knowledge and understanding of the key issues rewrite the summary of information on p80-82.
3. WA's obligations under that National Biodiversity Strategy (p80-81) need to be included, (not just international obligations). Indeed the national framework provides a way forward and this must be included.
4. Biodiversity is not just about protecting rare and endangered species. It is about protecting all natural remnants and ecosystem process.
5. Other important strategic State initiatives such as Bush Forever need to be included.

6. Objectives on p83 should include ending land clearing

7. Objectives should link into to the State's commitments under the National Biodiversity Strategy. An objective should be to meet the ***national biodiversity objectives and targets***. This Government is a signatory (signed by the Minister for the Environment Hon Dr J Edwards) to these targets
8. It is nonsense to suggest that nature-based tourism can *enhance* biodiversity and this needs to be corrected.
9. The Proposed actions should ***address the key threats to biodiversity***:
- Land clearing
 - Climate change
 - Changed groundwater regimes
 - Salinity
 - Weeds
 - Feral animals including domestic and feral cats, foxes, goats camels etc

The greatest threat to biodiversity is clearing. The UBC

- 10. Government Funding.** Many of the proposed actions imply substantial government funding. At present the whole biodiversity sector is grossly underfunded and a major shift in attitude toward funding is needed. Successive governments over the last 15 years have been steadily reducing funding of DEP, CALM and the conservation estate generally. Research and employment of technical experts such as Botanists and Biologists and other scientists has been squeezed below functional levels.. The current government has cut department budgets and programmes even more than predecessors.

The UBC is appalled that his Government has cut the budget to DEP by 24% this year on top of annual 10% cuts in the immediately preceding years. We believe our environmental watchdog has been functionally destroyed. This is totally unacceptable and funding must be restored increased dramatically to meet the demands of our complex, fragile but unique environment.

The UBC disagrees with the 'Global opportunities' section. This is unrealistic and somewhat hypocritical when our own programs are incomplete and grossly under funded.

Greenhouse and climate change (p86-91)

- 1. The UBC believes this section is hopelessly inadequate and needs rewriting. There is no basic data on current WA emissions or past emissions. Audits and estimates of emissions have been conducted in early 1990's, mid 1990's and more recently and this information should be presented. We believe WA has had the highest per capita increases of –50% in emissions since 1990. WA**

greenhouse emissions are an extremely serious problem and they must be addressed.

Our natural landscapes and diverse ecosystems are arguably the state's greatest natural asset. We stand to lose much of our biodiversity from rapid climate change if greenhouse emissions are not reduced by 70% according to the Australia Institute. It is alarming that the Sustainability Strategy has not even considered this issue. We suggest this is highly irresponsible.

2. Land clearing. The response should include an immediate end to land clearing.

3. The response should include the end to use of coal fired power stations and immediate mandatory energy efficiency measures across all sectors.

Yours sincerely,

Mary Gray
Vice President.