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This submission is framed in response to the Draft Report, and will be related to points in the *Overview*. The *Overview* brings sharply into focus the essential issues. It indicates that perhaps the majority of Departments and Agencies are not making an effort to achieve ESD, despite all the evidence from State of the Environment Reports etc that Australia’s development is not environmentally sustainable.

One might say in fact that Australia’s present development "aims to meet the needs of Australians today, while not conserving our ecosystems for the benefit of future generations."

Consequently, AESP NSW Branch congratulates the Productivity Commission on holding this important Inquiry, and is pleased to respond to their invitation for comment on new strategies for implementing ESD within Government.

AESP NSW supports the proposed independent Commission for ESD, because it would assist departments and agencies to develop long term sustainable development strategies.

It should be empowered to *require* ESD strategies be developed by Departments. This will be necessary in view of various Departments’ lack of performance so far.

A Commission for ESD would help achieve a better balance between the three elements of ESD - economy, society and environment. As the *Overview* points out (p xxviii) the monitoring of social and economic trends are already well established, but the environment has had relatively less attention in government.

**The Growth Ethic within Government**

**Firstly, with regard to the Productivity Commission.**

AESP notes that the Productivity Commission incorporates ESD guidelines, even if previous bodies which made it up did not. This is a most positive development, and it is heartening that the Productivity Commission has responded to what they see as the public’s growing concern during the 1970s and 1980s about the impact of growth and development on the environment (p xv). There is much important work to be done, due to the short-term thinking on economics and the entrenched advocacy roles of Departments.
Secondly, the Growth Ethic with regard to other Departments and Agencies

Those Government Departments which see themselves as having an advocacy role for growth should be the first to develop ESD guidelines and policies. The Department which stands out as the most consistent advocate for growth is the Department of Immigration and Multicultural Affairs. It is significant that DIMA has not involved itself with ESD reporting. This is surely an example of one of the Departments which "fail to follow good practice policy making" (p xxi).

DIMA and Australia’s Immigration Program.

It is said that while Australia does not have a Population Policy, the Immigration Program as it has existed during the post-war period is a de facto policy of population growth, continued by all governments. The population has grown from 7 million to close to 19 million in that period. Fuelled by the present immigration rate, population growth will continue to rise for many decades, despite any reduction in natural increase. At the same time, per capita consumption has grown, and there have been no voices raised in government calling for a reduction in personal consumption; very much the reverse.

This population plus consumption growth puts increasing pressure on all aspects of the environment, on a multitude of our limited natural resources, and on society. Problems areas arising from population growth/immigration include:

- Water supply and sewerage services
- Air pollution
- Additional infrastructure costs
- Constant competition for land for building and rural use
- Road congestion in cities, and demand for freeway construction
- Over-expenditure on housing rather than investment in productive industry
- Avoidance of professional training by business in favour of importing skilled workers
- Capital widening investment as opposed to capital deepening
- Increased dependence on ecosystems to grow cash crops for domestic and export markets
- Increased impact on land and native species

Apart from the obvious solution of reducing immigration, there are stop-gap solutions to these problem areas which should also be followed, but they all involve high costs. **DIMA has made no attempt to come to grips with the problems attendant on its policies, has avoided a genuine assessment of the costs to government of its policies, and has made no environmental impact assessment of immigration.**

Recently we have learnt that DIMA is now financially supporting a wide-ranging and important environmental study being carried out by CSIRO’s Division of Wildlife and Ecology - the Ecumene Project. This is broadly speaking a study of human settlement and natural resources by region, or population and the environment. DIMA’s interest in...
this study may indicate that they are prepared to take a fresh look at how population growth/immigration is impacting the environment. However, DIMA’s long record of avoiding this issue does not give much confidence that they will easily change their institutional support for high immigration.

This high-immigration advocacy role of the Department has been pervasive. It is instructive to look at the work done by the now disbanded Bureau of Immigration Research, renamed the Bureau of Immigration, Multicultural and Population Research, a body within DIMA which was supposed to provide objective research findings on immigration. In practice the BIR/BIMPR only researched pro-immigration subjects, and published them along with "multicultural stories" in a glossy.

One exception to this pro-immigration slant was the publication in 1992 by the BIR of a pair of very detailed financial studies of the costs of immigration at Federal and State level. The studies showed that the costs were unexpectedly high, especially at State level. The two studies have since been routinely discounted or ignored. The costs in the two studies were not amalgamated to give a usable whole-of-government cost.

The two studies were titled *Immigration and the Commonwealth Budget* and *Immigration and State Budgets*. The costs to the States, arising largely from infrastructure costs, were much higher than costs to the Federal Government. But there were no special purpose Federal grants to the States to cover these expenses. This meant that the Federal Government was imposing costs on the States through a Federal policy (Immigration) while not taking responsibility for the resulting costs. Over the decades the result has been that State services have been badly over-extended by the immigration policy. The author of the *State Budgets* study, Professor Russell Mathews, commented:

"Even if immigration were to cease completely, an enormous backlog would need to be made good, to remedy past deficiencies in service provision resulting from the failure to co-ordinate immigration policies with fiscal policies and the employment, housing, infrastructure, education and other expenditure needs of migrants and the existing population."

But DIMA officers discount their responsibility for this large-scale social problem. If this is true in the social sphere, it is more strikingly so in the environmental sphere.

It might be urged that the task of doing an ESD study or an environmental impact assessment of Immigration is beyond the capacity of the Immigration Department because the issues are so complex. However, a start can be made on the simpler issues, such as population growth and water use.

**A study on water and sewerage would consider that:**

Increasing demands are made on pondages due to population growth, notably in Sydney, but also in Coffs Harbour, which takes many people fleeing from Sydney’s
overpopulation. Coffs Harbour is now calling for further dam building so that a rising population can be settled. The alternative of recycling sewage effluent, which people do not want, would be enormously expensive.

The Murray-Darling Basin Commission is remediating environmental problems, but the existing population in the Basin depends on irrigation water from the Snowy Mountains Scheme, which practically sucks the Snowy River dry. Farmers in the Murray Darling are opposing the requests of Snowy River communities to allow Snowy River water to flow again with as little as 27% of its natural run. This indicates the over-dependence of Murray Darling agricultural communities on exploiting water at the expense of river ecosystems on the Eastern side of the Snowy Mountains.

**Ecological Footprint Methodology**

Ecological Footprint is a methodology which DIMA might pursue in an ESD study. This is a way of assessing the environmental impact of a given population, usually a city. In the case of Sydney, according to the NSW Environment Protection Agency’s *NSW State of the Environment Report 1997*: "The ecological footprint of Sydney can be estimated at 26 million hectares, 37 times the size of its land area" due to the population’s need for food and water, consumer goods, services, transport and housing. Ecological footprint gives us a statistical measure of the environmental impact of a given population.

Ecological footprint tells us that population issues are not confined to the urban scene; that population numbers, in harness with the consumption level, are at the root of all our environmental problems. The more a given population grows, with its particular consumption level, the greater will be its ecological footprint and environmental impact. The environmental impact of the Immigration Program, as a contributor to Australia’s population increase, can be assessed in this way.

**Conclusion**

The establishment of an independent Commission for ESD will help Departments such as DIMA prepare ESD reports, especially where their core business has been guided by the growth ethic, as DIMA’s has.

Population growth, and particularly the Immigration Program which has served as a de facto policy of population growth, should urgently be examined according to ESD principles.

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on behalf of AESP Inc, NSW Branch