

DEPARTMENT of
PREMIER and CABINET TASMANIA

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Mr N Byron
Presiding Commissioner
ESD Inquiry
Productivity Commission
LB 2 Collins Street East
MELBOURNE VIC 8003

Dear Mr Byron

Thank you for your letter of 24 February 1999 inviting comments on the draft report of the Productivity Commission's Inquiry into the Implementation of Ecologically Sustainable Development (ESD).

Your letter specifically requested comments on draft recommendation 7.5 concerning the development of a framework to facilitate performance measurement and enable comparisons between jurisdictions.

The Tasmanian Government considers that it will be difficult to develop a suite of meaningful performance measures that can be usefully applied over the full range of actions used to address various resource management problems. Although useful indicators can sometimes be developed to measure performance against ESD objectives for specific management issues (eg performance indicators for specific fishing management plans), these need to be of a very detailed and issue-specific nature to be of real value.

A national framework for performance measures against ESD objectives is therefore likely to result in generic indicators with very little real value. This has been demonstrated in the development of the current Natural Heritage Trust framework, where considerable time and resources were spent developing indicators for performance measurement that could not be used or were rejected at Commonwealth Ministerial level. The resources expended on developing such a framework would be far better utilised on addressing the resource management issues themselves.

The cost implications for Tasmania would need to be considered in any proposed national framework for performance measurement. Any new requirements placed on the State by the Commonwealth, in addition to current State measurements, would need to be funded by the Commonwealth.

In addition, national performance measurement would not assist Tasmania further develop ESD principles in its decision making, as Tasmania's Resources Management and Planning System and associated legislation already incorporates ESD objectives for resource management and industry development.

Comments on other aspects of the report are attached for you information,

Thank you for the opportunity to comment.

Yours sincerely

Linda Hornsey
Secretary
9 April 1999

Additional comments by the Tasmanian Government on the draft report's recommendations:

Draft recommendation 7.1 is supported.

Draft recommendation 7.2 is supported, provided prior meaningful consultation with the States and Territories occurs.

Draft recommendation 7.3 is supported. However, it is considered that the National Land and Water Resources Audit (NLWRA) is a poor practical model for better integration of ESD objectives. The NLWRA is perceived to be largely reproducing existing State information into a national format, rather than providing improved data for State natural resource managers. It is recommended that the Commonwealth develop a more collaborative approach consistent with State requirements, by ensuring common data collection standards and participating in the funding of baseline data collection networks.

It should also be noted that if draft recommendation 7.3 was ultimately extended by the Commonwealth to include the States, the funding of associated monitoring costs could become an issue.

Draft recommendation 7.4 is supported in principle, and should include the States and Territories in the list of stakeholders for consultation. However, although the Tasmanian Government acknowledges that ESD data collection should be rationalised and standardised, it is questionable whether the Australian Bureau of Statistics (ABS) is the most appropriate organisation to undertake this. There would need to be a major paradigm shift for the ABS to be able to handle such information in order to establish credibility, provide the necessary levels of quality assurance and quality control, and in order to be able to service customers.

Other comments by the Tasmanian Government on the draft report

Pp XX, last paragraph - it is agreed that there is little long term commitment to information gathering and reporting in relation to the environmental dimensions of ESD.

Pp XXIII, paragraph 3 - it is agreed that there are currently no effective Commonwealth-State coordinating mechanisms for ESD monitoring and reporting activities. For example, the Commonwealth has committed large resources to producing a national State of the Environment (SoE) report, while States and Territories each produce their own independent SoE reports. A more cost-effective approach would be to facilitate the standardisation of State and Territory SoE reports, from which a summary document could be produced for Australia. This is one of many examples where the Federal Government could encourage a collaborative and cooperative approach to natural resource management issues.

Pp 65, paragraph 4 - although the sentiments identified in this paragraph are generally true, it should be noted that a major issue in monitoring ESD related government activities is the identification of trends. This requires long term baseline monitoring and better understanding of the basic ecological and physical processes of natural systems.

Pp 65, paragraph 5, last sentence - it should be clarified that in many cases, once a clear impact has been identified through monitoring activities, the management actions required to alleviate that impact may be too expensive to implement or subject to a high risk of failure. There may even be no management intervention possible.

Pp 88, paragraph 4 - in addition to the described limitations on developing EIAs, there is also a lack of baseline information which could be extrapolated to sites subject to EIAs. Although it will be impossible in many cases to have site-specific information, the availability of baseline monitoring systems may facilitate a better assessment of environmental risk. It is suggested that the States and the Commonwealth should share the lead role in the provision of this baseline information, as the Commonwealth does in relation to the Bureau of Meteorology.

Pp 112, comment from the Environmental Research and Information Consortium Pty Ltd - although this comment is true in part, standard practice in the use of environmental data sets is to charge for additional time spent preparing the data for a customer and for transfer costs to that customer, rather than for the data itself. These costs are in fact minimal compared with the costs associated with the initial data collection. It is also important for quality control purposes for the organisation involved in data collection remains custodian of that data.

Pp 114, paragraph 2 - although the general sentiment expressed in this paragraph is agreed with, it should be noted that funding pressures are increasingly resulting in single-purpose specific monitoring, rather than more general data collection networks of use to multiple parties. Hence the availability and comparability of data is often restricted (see also comments on pp88, paragraph 4).