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RESPONSE TO ESD DRAFT REPORT

The draft report has successfully addressed the lack of accountability by the Commonwealth in the pursuit of ESD because of a lack of monitoring and evaluation activity. The report also highlights the important issue of the lack of industry access to public data for ESD purposes. However, the report fails to highlight the central reason why these institutional barriers still exist in the implementation of ESD. The report has to answer the question about whether the public and industry are getting value for money through Commonwealth agencies undertaking ESD services.

The primary reason that a low level of productivity is apparent in the performance of Commonwealth agencies is that they have hijacked the ESD agenda away from the private service industries (essentially the environmental and resource management consultants) that are best positioned to implement ESD. It is important to appreciate that ESD is only achieved through the management practices employed in resource development. The Commonwealth agencies can only ever be facilitators in this process by providing funds, policy, regulation, control and quality assurance: not through the deliver of ESD services.

The Commonwealth has failed to empower the private industry services sector with the data, information, funds and business opportunities to fully participate in ESD and collaborate with the development industries in pursuit of best management practices in ESD.

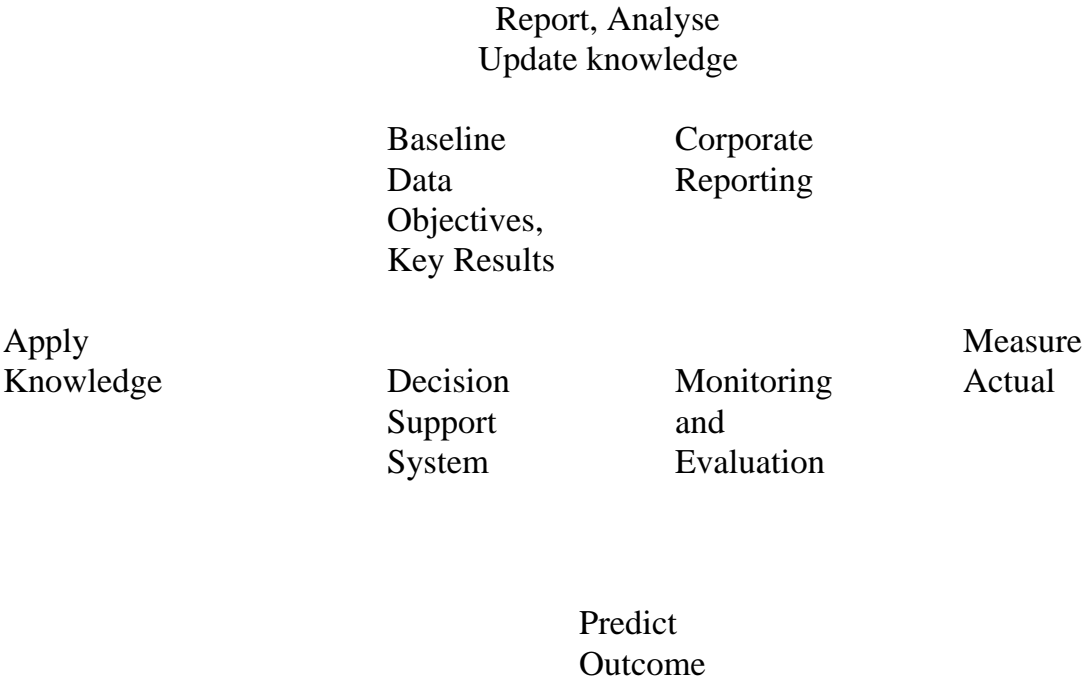
The Commonwealth provides considerable services in competition with private industry in the environmental area, including R&D. The report highlights many of these arrangements, eg. page 199 details how the MDBC allocates funds to the NSW DWLC to refine performance indicators, and how the CSIRO and BRS use remotely sensed data for resource condition monitoring purposes. The Commonwealth agencies have a great capacity to cycle monies between each other and ignore the capability of private industry to deliver superior services and results. It is critical for the

Commonwealth to empower private industry with a greater capacity to deliver ESD services to the development industry.

The report would provide greater value if recommendations addressed the following issues:

- The Commonwealth adopt the ISO14004 principles, guidelines and model of feedback and process of continuous improvement as the central and overarching planning framework for the implementation ESD;

EMIS Model (ISO 14004)



- The Commonwealth adopt a data policy to provide the development industry with public data at little or no cost and without licence restrictions (ie. an open data policy); and
- The Commonwealth adopt the national competition policy for the ESD process and restrict its activities to policy development, regulation, control and quality assurance and not attempt to undertake services that can be provided by private industry services.

Greater productivity can be achieved in ESD where the development industries and the supporting consultancy services of private industry are given the opportunities and resources to develop and apply the data, information, knowledge and modern environmental information technology to achieve best management practices. The Commonwealth agencies, along with State agencies, have stifled the implementation of ESD with institutional barriers. There is now the opportunity for the Productivity Commission to highlight a more effective process for the implementation of ESD by

making firm recommendations to remove institutional barriers at the Commonwealth level.

By contract, the current report recommendations will perpetuate the bureaucracy surrounding ESD as they fail to address the ESD client; ie. the development industries who are responsible for implementing and managing ESD and the environmental consultancy service industry who delivers the appropriate ESD services.

The report provides no evidence that there is greater productivity to be gained in ESD by one Commonwealth agency funding another to deliver ESD services in baseline mapping, decision support, monitoring and evaluation, and reporting. Therefore, the report must make a concerted attempt to address the ingrained culture of the Commonwealth's environmental and resources agencies to control data, information, knowledge, information technology, R&D and ESD services.

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