

ACN 061 777 937 Affiliated with the International Council of Women  
Suite 1.06 Queen Victoria Women's Centre 210 Lonsdale Street Melbourne Victoria  
3000  
Telephone 61 3 9662 9177 Facsimile 61 3 9662 9477 E-mail NCWA@bigpond.com

Australian Adviser on Environment  
NCWA Ltd.,  
Mrs. Linley Grant O.A.M., B.A.(Hons.)  
79 Mount Stuart Road  
MOUNT STUART 7000  
Ph, (03) 6234 6672

12/4/1999

Helen Silver  
First Assistant Commissioner  
Productivity Commission  
35 Collins Street East  
MELBOURNE 3001

Dear Helen Silver,

Please find enclosed the submission of the National Council of Women of Australia Ltd. on *The Draft Report on Implementation of Ecologically Sustainable Development by Commonwealth Departments and Agencies, (Draft Report)*

The National Council of Women of Australia Ltd., (NCWA ) thanks the Productivity Commission for including NCWA on its mailing list and for the opportunity afforded the organisations affiliated with NCWA to be better informed and to comment on the content of this most important *Draft Report*.

NCWA Ltd. received the first copies of *Draft Report* on 16 March and then was required to ensure that NCsW Australia-wide had the opportunity for input. Your covering letter was circulated to each of the Advisers on the Environment in the state and territory NCsW, with the request that they obtain a copy of the *Draft Report*, themselves. There has been insufficient time since then to obtain adequate input on the *Draft Report* from the affiliated organisations. However, Advisers on the Environment in five state and territory NCSW have now provided material.

We the apologise for the delay in forwarding our submission.

Yours sincerely,  
Linley Grant  
NATIONAL ADVISER TO NCWA ON ENVIRONMENT

SUBMISSION TO THE PRODUCTIVITY COMMISSION ON THE  
IMPLEMENTATION OF ECOLOGICALLY SUSTAINABLE DEVELOPMENT BY  
COMMONWEALTH DEPARTMENTS AND AGENCIES.  
BY THE NATIONAL COUNCIL OF WOMEN OF AUSTRALIA Ltd, 7/4/'99

PREAMBLE

The National Council of Women of Australia Ltd., (NCWA ) consists of over 470 non-government organisations, Australia wide, ( List attached). It was established in 1931 following State and Territory co-operation by existing NCsW from 1902, (current Brochure attached - Appendix 1). The original aim of the International Council of Women (ICW) from 1888, was to unite women to work together in the best interests of families and communities. NCWA Ltd therefore has a record of long-standing concern related to every aspect of sustainable development for present and future generations.

NCW in Australia has been actively involved in working for the implementation of sustainable development in Australia since the release of the Bruntland Report '*Our Common Future*' in 1987,<sup>1</sup> and following that, the release of *Agenda 21*, although of course , there are national and international resolutions related to specific concerns about sustainable development, stemming from virtually the first International Conference of the International Council of Women in 1888.

The Adviser on the Environment in each State and Territory NCW consults with experts in the community and obtains information for the affiliated organisations on which their delegates can base decisions. With two exceptions, the current Advisers do not have formal qualification in this field. However, over many years, the Advisers have engaged in consistent consultation with the affiliated organisations which make up their NCsW on a range of issues related to national and local environmental legislation, and they report very strong general support from the women in the affiliated organisations, for the implementation of sustainable development in every way, throughout Australia. All resolutions to NCWA National Conferences in relation to sustainable development, have been ratified.

The Advisers who have responded to the request for input on *The Draft Report on the Implementation of Ecologically Sustainable Development by Commonwealth Departments and Agencies (Draft Report)* consider that it is one of the most important documents to have been prepared for Australia on future quality of life and the environment. They congratulate the Productivity Commission on a sufficiently detailed, yet succinct overview of the related issues outlined in the Draft Report.. They also consider that it has been most successful. as an opportunity for increasing the community's understanding of the range of issues, inter-related, present and future challenges, including possible Departmental and Agency responses to the broad topic of 'sustainable development.'

SUBMISSION

## 1, FINDINGS

The Advisers view the Findings outlined in the *Draft Report* as not unexpected, given the breadth of response required. They support the embedded recommendations related to further implementation, e.g. ‘*good practice policy making*’ (Finding 6.1, p.xxvi), and ‘output based management’ (Finding 6.3, p.xxvii), etc., provided that these do not become an end in themselves, but remain a logical methodology for achieving the overall goal of improved ecologically sustainable development (ESD) for the nation .

While our members applaud what has already been done in the way of implementation by the various Departments, those of NCWA's members with a particular interest in environmental matters and maintenance of bio-diversity, etc. have been concerned for some time at the paucity of research and great need for more knowledge in this area to enable sound, long-term decision-making to proceed, at all levels of Government, Australia-wide via adequate, continuing, unbiased research and education.. Also that there has been little work on monitoring or reappraisal by many Departments, given the rapidity with which environmental and social problems are developing in Australia.

## 2. RECOMMENDATIONS

The Advisers fully support each of the Recommendations outlined in the *Draft Report*.

## 3. DEVELOPING FUTURE DIRECTIONS FOR ESD

NCWA fully supports -

- implementation of the *National Strategy for ESD*,<sup>2</sup> except that it considers that the Strategy should be amended to provide for more Government commitment to balanced ESD via an increase in emphasis on the social and environmental aspects of SD, weighted to balance the emphasis on economic development. Also that Government Departments and Agencies should do more than just maintain essential processes and life support systems". NCWA considers that the Commonwealth Government has a greater responsibility for the overall well-being of the nation than this; and that the environment must come first, because there will be little economic growth or social sustainability if the environment is being systematically destroyed.
- recognition that each Department and Agency must be involved in active ESD promotion and management, both within and beyond that to its client base;
- that every citizen needs to be involved in attitude and behaviour changes in the promotion and implementation of ESD;
- recognition of the need for clarification of what constitutes SD and ESD; and the need for co-ordination, co-operation, good practice policy making, monitoring and performance measurement, and particularly, a change to a longer-term future policy focus in relation to ESD.

- there is also a great need for active community education and implementation of the tenets of the Earth Charter as an ethical basis for decision making in a collaborative process in relation to hedonism,- also an acceptance by most adults, particularly by retired people, that there is a role and a responsibility for them in implementing ESD in its totality, in their own communities.

## THE PRODUCTIVITY COMMISSION'S REQUEST FOR VIEWS ON-

### 1. THE PROPOSED PERFORMANCE MEASUREMENT EXERCISE (p.xxxi)

#### 1. 1. One off, or ongoing?

NCWA fully supports Recommendation 7.3. The Advisers to NCWA consider that, in general, there should be an on-going exercise, not necessary annually, probably midterm or bi-annually, to fit in with the term of the Government, and to give a longer period than one year in which to gauge trends or effects, because many measurements related to ESD need a longer time-frame. There may be a need for one-off exercises at times.

The Advisers consider that many performance measurement exercises should not be limited to a Department or Agency, but take greater account of the community involvement. At present, many Government measures appear to be too confined, in relation to effective ESD implementation.

#### 1. 2. Priority Areas for Review and the Basis Upon Which Priority Areas for SD Should be Selected

Besides the areas outlined in the *Draft Report*, the following have been of concern to the affiliated organisations for some time -

- Areas within and between Government Department Agencies where there is existing concern, conflict or lack of co-ordination, or clear delineation of responsibilities; and acceptance of ethical responsibilities in relation to ESD, causes community concern and distress.

The members consider that any area where there is unresolved friction, or the likelihood of future friction or lack of co-ordination and acceptance of ethical responsibility between and within each level of Government and within the community will result in a continuing waste of Australian and Government resources. This means that gaps and overlap in existing or planned legislation need to be identified. Answers to critical ESD questions especially social and environmental questions need to be clarified by definitive, independent research. The need to establish an over-arching body, such as a Commission for ESD, to take the responsibility for implementation appears essential.

Our members could provide many examples at all levels of Government where the above problems have resulted in waste; e.g. it may be as simple as one section of local government digging up part of a road one week and having it resealed, only to have another come along three weeks later and dig up exactly the same section all over again for another purpose and having to reseat it again. Many more serious and

distressing examples could be cited, in relation to all Government Departments and Agencies, at every level.

- imminent degradation of particular and important social and environmental ecosystems and quality of life, both urban and rural, which come under the aegis of each Department/ Agency, or combinations of these, due to the current emphasis on economic criteria, rather than in balance with social and environmental strands of ESD, symptoms of which include - vandalism, the breakdown of rural communities; the desertification of inner cities; unemployment; the infiltration of drugs into school communities; the increase in suicide; the reduction of quality care in public hospitals, and similarly in relation to the provision of most government services, including education, public transport, etc.
- the relationship between change, adequate research and community dissent. Timely, adequate research and balanced consideration of the three facets of ESD may well have prevented past community dissent and the resultant costly Government intervention in relation to, e.g. Lake Peddar and the Franklin River, the Hinchinbrook development, etc. In future the building of a sound knowledge base focussed on ESD, may help prevent further ecological loss, widespread community dissent and dissatisfaction and costly intervention in relation to, e.g. - Jabiluka, the Daintree, the Tarkine, the remaining oldgrowth forests in W.A. and Tasmania, the main river systems of Australia, Diamond Gorge, etc., Decisions based on ESD could create a satisfying feeling that the best interests of the community , the landmass and surrounding ecosystems as a whole, both now and in the future, had been adequately considered, instead of present widely held feelings of continuing disapproval.

Several affiliated organisations have noted a tolerance of unsustainable change by urban communities until it has become destructive. This seems to be a problem which must be factored into in the monitoring process. The Advisers note that there has usually been less open dissent about the impact of various urban developments, notwithstanding that many of these are ultimately destructive of the viability and quality of life of communities, e.g., the building of freeways and high-rise buildings, and destruction which occurs to accommodate them. It has been noted that where a community has been adequately involved in the pre-planning, e.g. the ABC TV tower on Mount Wellington, the result has been ecologically sustainable and aesthetically well accepted.

If, therefore community satisfaction or levels of discontent were to be consistently monitored by all Departments and agencies, particularly in pre-planning or monitoring of any environmental change, it might provide a useful index for priority ESD intervention, particularly in relation to the likely impact of a particular activity. The community could be more involved in this process, in a type of "Neighbourhood Watch ESD" program, e.g, delivering and collecting questionnaires and specific observation, related to the monitoring process.

## 2. WHICH PROPOSAL ... ? (p.xxxiii)

NCWA Advisers support the directions outlined in the Draft Report. Because of the size of the task of implementation, notwithstanding the good work which has already commenced, NCWA Advisers see an immediate need for the setting up of a Commission with super-ordinate goals and over-riding powers, to assist in every way the appreciation and development of the three strands of ESD ideology and practices within the various Departments, and Agencies. Also to oversee the implementation of ESD across, between and within all Government Departments and Agencies, as well as assist and educate various other levels of government throughout the Australian community .

The Advisers consider that a mechanism such as a Commission, with sufficient powers to be effective, is the only adequate solution at this time, for Australia. The ramifications of ESD appreciation are extensive, let alone implementation in all aspects of Department /Agency work, if the responsible body is to assist inadequate co-ordination, cooperation, prevention of duplication and gaps etc., during the implementation phase, as described in the Draft Report. As well, there is the need to extend implementation into, and involve the Australian community fully in the process.

To be effective, a Commission would require sufficient powers and flexibility to assist each section of Government to implement best practice, initiate research projects particularly those which help integrate the social and environmental strands of ESD with essential economic processes, help create or adapt adequate measurement tools, methods of coordination, compliance, and feedback, etc., in line with best practice, and to help set up a knowledge base upon which 'best practice decisions' could be made objectively. A Commission could also assist Departments/Agencies to implement voluntary codes of conduct, and duty of care etc. into their practice, as required. As well, it could assist in selecting the most appropriate research organisation(s) for particular tasks, and help co-ordinate the work if several research organisations or Universities were involved in obtaining various types of data required for full social, economic and environmental assessment and monitoring.

At a later stage, it might be important to adapt to a semi-government National Council. A non-government body would be ineffective. However, a semi-Government body could help maintain 'grass-roots' input and links with the bureaucracy in on-going implementation, monitoring and follow-up action.

## 3. OTHER MEANS BY WHICH COMMITMENT TO ESD IMPLEMENTATION MIGHT BE STRENGTHENED. (pxxxiii)

### 3.1. As stated above -

- a commitment to the 'precautionary principle,' by each Department and Agency;

- a commitment to implementation of ESD via the ethical constraints of The Earth Charter,

the development of a format for ESD Impact Statements by the organisation given the over-riding responsibility for implementing ESD, (*Commissioner for ESD*) in order to include adequate consideration of long-term social and environmental considerations as well as economic, and the mandatory use of ESD Impact Statements by all Government Departments and Agencies; more adequate and consistent involvement of the community, via an improved consultative processes, involving interactive education, observation, research and measurement; recognising that improvement in current methods of community involvement and "consultation" is urgently required;

- a commitment by Government Departments/ Agencies to providing children with access to a healthy environment and responsible parenting in relation to ESD implementation, Rachel Carson states in *A Sense of Wonder*, that 'all a child needs is one adult to show them the beauty of the bush,'<sup>3</sup>
- a 'first alert' or early warning mechanism, like a "Neighbourhood Watch ESD alert system," could be of assistance; an alert by the community is frequently the first indicator that something is out of balance in relation to ESD, e.g. - introduced pests, decline in frog populations, toxic waste seepage, destruction of a city building, toxic fumes. However, those who first alert a section of government to a problem are often disregarded until the problem is serious. There appears to be a great need for a legalised- process of early warning; so that immediate 'First Alert' monitoring of the 'problem' can be set in place by whichever sector or level of government happens to receive the alert. Members of NCWA have cited numerous examples where a person in a Local Council or Government Department was given a warning, but no record was made or action taken, because that person did not see the problem as his/her particular responsibility. Nothing was done until thousands of dollars have been needed in remediation, e.g. residents warned the Local Council that the Sewage Treatment Plant at Ranelagh (Tas.) would be sited on a flood plain, but it was built. It now has to be demolished and resited elsewhere at significant cost. A great deal might be achieved if an agreed protocol was in place, which could be applied in every instance by even the most remote Local Council, or outreach of, e.g., the Education or Health Department, right up to central Departments or Agencies. A protocol could include the setting up of a monitoring system and informing the 'Commission for ESD' or over-arching agency responsible. This body could then decide if monitoring should continue, and pass on responsibility to the most appropriate Department or Agency, so that the problem could not be ignored, as has happened so often before. Such a system might help prevent future, costly, post hoc interventions. The community could be involved in the total monitoring - feedback- re-appraisal process;

- the use of regular monitoring, waste assessment, re-appraisal, and appropriate follow-up procedures, including community assessment of results, developed by each, and involving each Department and Agency, and the community.

#### 4. THE MERIT OF DEVELOPING FUTURE DIRECTION FOR ESD (*p.xXxiii*)

- To allay concern over the Commonwealth Government's changing role re its overall responsibility for the Australian environment.

Members are concerned that at present, ESD considerations in recent environmental legislation, e.g., the COAG Agreement (1-992), the 'Environmental Protection and Bio-diversity Bill, and the Regional Forest Agreement legislation, see the relinquishing of some of the Commonwealth's traditional responsibility for the environment in favour of State and Territory management.

Many in the community are seriously concerned about this change because of past environmental mismanagement in numerous instances and because of increasing pressures on state and territory legislators and local governments, from those involved in economic solutions to social problems. Particularly when some legislators see 'globalization' as a blessing and others see it as the cause of social and community breakdown in other societies. If each Commonwealth Department and Agency develops the longer-term, coordinated, national direction required for successful implementation of ESD for the nation, it will in some measure, restore balance and reassure the community.

- To allay concern at the long-term negative effect of uncontrolled 'globalization' 'economic growth, "market forces' and 'competition policy!

Many people in the community and in NCWA's affiliated organisations seriously question the impact of 'globalization' and the reliance upon 'economic growth, 'market forces' and 'competition policy' to provide quality of life, or to be used as indicators of quality of life, or ESD in Australia. The level of concern appears to have profound implications for the Government in relation to ESD, and appears to require immediate consideration in the future direction for ESD studies. Members cite, e.g. the work of Dr. Keith Suter<sup>4</sup> and the 30 year study by Lea Jellinek,<sup>5</sup> originally set out in *The Wheel of Fortune, A History of a Poor Community in Jakarta* and continued since, concerning the negative effect of unbridled 'globalization,' 'economic growth' and 'development' without consideration of the effect on the environment, social factors and life-style of the various stratas of the community once living in relative comfort together in Jakarta. Dr. Jellinek has shown how the end result of these policies, is a serious imbalance which has resulted in the inevitable destruction of the community, leading to social disorder, rioting and desertification of the city, as we have seen on television. Members of NCWA are also similarly, citing the work of John Ralston Saul,<sup>6</sup> and Keith Suter<sup>7</sup> in relation to the need for the Government to provide the balancing mechanisms, to counteract the inevitable results of current directions, via more complete implementation of the three strands of ESD throughout all Government Departments and Agencies.



- To ensure balanced and comfortable future development and a satisfactory future way of life in Australia and help prevent the mistakes of the past NCWA's Advisers view the development of future directions for ESD, via the setting up of a strong body to oversee ESD in and by all Departments/ Agencies, as an appropriate and necessary method of addressing many of the above larger concerns, apart from addressing the specific, internal Departmental /Agency directions and priorities already expressed in the Recommendations and on-going Departmental Reviews.
- To assist in the development of more useful tools of measurement by which to ensure effective ESD decision making and future action.  
NCWA trusts that each Recommendation will be implemented in full, including a real commitment to the development and use of effective tools to measure social (including quality of life), and environmental indices as well as economic ones. For example, several member organisations cited the urgency of the need for certainty re the population levels that the Australian continent and ecosystems can sustain. They cite the CSIRO studies of 1992-1994 and *Ecumene Project 1997*<sup>8</sup> The Advisers endorse these findings, e.g. as outlined in *Measuring Progress, Is Life Getting Better*, by R. Eckersley<sup>9</sup> and continuing research by the CSIRO as a means of providing suitable indicators of progress in ESD implementation.

Some members have argued that lack of knowledge has a confusing, unsettling and disempowering effect on the community, also the Government. These affiliated organisations consider that this increases community distrust of decision -making by the various levels of government and their departments; and that it also contributes to increased selfishness, intolerance and disrespect in the community.

It appears to NCWA that in its own interests, there is a most urgent need for the Government and the bureaucracy to provide themselves and the community with an increased knowledge base, firmly founded on a balance between the three aspects of ESD, upon which good decision-making can be securely undertaken. and the trust of the community can be founded.

- To better identify national goals, values and needs, particularly long-term goals which will further assist decision makers to prevent waste  
Future ESD direction for the Australian community appears to involve discovery , definition and articulation of the future vision, long-term values and ESD needs of the Australian community as a whole, probably in relation to various ecological regions, rather than in too broad, or in an ad-hoc, fragmented fashion. A co-ordinated and measurable goal-setting, national exercise appears to be required, which might be conducted by the Australian Bureau of Statistics during the next Census.
- produce profound, positive long-term advantages -

Such an exercise and a commitment to balanced ESD and long-term positive direction setting , apart from maintaining biodiversity and essential ecosystems for future generations , could inter alia -

- unite the community and restore trust in Government;
- develop improved relationships and partnerships between the various bureaucracies; also between the community and levels of Government;
- give Government and the bureaucracies a longer term view in terms of decision-making and management practices versus 'political expediency';
- increase the knowledge base, essential to sound and statesman-like decisionmaking; particularly to generate social and environmental criteria to equal those of the current economic theorists;
- satisfy the very strong 'will to survive' and desire to pass on genetic inheritance and property to the next generation. There is security and satisfaction in the knowledge that individual and community action is not destroying any important existing ecosystem or sub-system, or valued aspects of the Australian way of life and unique environment. A feeling of involvement in this process helps provide a strong social 'glue', a sense of national identity, individual pride and self-respect which many young Australians are seeking;
- reduce present confusion.

Dixon and Fallon 10 point to similar advantages - greater awareness of the necessity of consideration of long-term as well as short term implications (impacts) of resource use, a better global and intergenerational focus for sustainability, an acceptance of the need to move away from a 'markets' approach for appropriate sustainable development and less likelihood (because of the rejection of ad-hoc decision making), of really bad projects.

## 5. POSSIBLE SUBJECT AREAS FOR FUTURE STRATEGIC DIRECTION

Several members of NCWA pointed to the many conflicting and confusing statements reaching the general community from various levels and sectors of government, also the global financial institutions, lobby/interest groups and the media, Australia-wide. These seem to several of the members organisations of NCWA to provide subject areas for future urgent strategic direction, e.g. -

- the population density the Australian continent can actually sustain in relation to the ratio of births and immigration levels to deaths
- the long-term impact of clear felling and cable-logging on bio-diversity in remaining non-plantation forests, and on their eco-systems;
- the buying of Australian water leases, particularly by foreign investors;
- the quantity of water required for irrigation, dams, etc. versus that required to prevent degradation of river systems;
- the control of seed banks of Australian flora by monolithic multinationals;
- the long-term effect of uranium mining and disposal of radio-active waste,-
- the health risks associated with LMF radiation, genetic engineering of food, etc, the loss of quality care in public hospitals,

- the increase, or otherwise of land degradation being used for various crops, including cotton, opium, etc,
- increase in CO2 levels, continued loss of the ozone layer, climate change, etc.,
- the desertification of cities and destruction of rural communities;
- questions related to foreign investment and foreign land ownership;
- the continued loss of native flora and fauna,
- questions related to 'economic growth' and reliance upon economic criteria, and the adequacy of economic tools , as a criterion for measuring, e g. quality of life and sustainability of communities , etc,
- the current imbalance related to the main determinants of future sustainability development;
- sustainable methods of job creation and poverty reduction-, versus present methods of grasping at short-term, unsustainable, growth dependent " straws."

NCW of Tasmania Inc. reported that it was told of a simple question to be asked in relation to ESD and the Australian environment, "Are the same native flora and fauna increasing or decreasing in an area, particularly the very small flora and fauna?" If the numbers are stable, or increasing only slightly, there is a reasonable chance that balanced sustainability, developed over millions of years, is occurring in all surrounding ecosystems in those areas or regions. Some of NCWT's member organisations suggest that adequate monitoring of the smaller native species could be of value and provide future. direction for ESD.

Other affiliated organisations in NCWA pointed to the useful means of progressing ESD as set out in Australia's Ocean Policy and the need for each section of Government to translate the methods outlined in this document, into a way forward for their own Department or Agency.

Michale Common, in his book, Sustainability and Policy: Limited to Economics,<sup>11</sup> suggests that there are six attributes of environmental problems -

- Spacial extent - how extensive is the geographical area affected by the problem?
- temporal extent - how long has it lasted?
- impact - how many people are affected?
- how complex is the problem?
- understanding the problem - and the complications related to ignorance.
- intractability of the problem.

He suggests a means of ranking of these problems as threats to sustainability and to the prioritisation of response to them in the context of sustainability. The Advisers suggest that this could provide a lead as to new strategic directions for ESD in each Department/Agency.

## 6. ALTERNATIVE INSTITUTIONAL FRAMEWORKS OF CONSULTATIVE FORA.

NCWA has been concerned for some time at existing government mechanisms for consultation with the community and the invisibility to the community of many of the groups with which the Government consults, e.g. those with expertise, or the special interest groups. Some of the member organisations of NCWA consider that greater democracy is required and that a summary of the minutes of all major meetings in relation to ESD, should be made available via, e.g. the Internet, excluding only specific items of a sensitive nature.

A number of the members of NCWA support the use of expert advisory groups to work with the body ultimately made responsible for ESD implementation. However, following their input, the NCWA Advisers see the need for the development of a process of greater and more satisfactory community input, before major ESD decisions within Departments/ Agencies are made, because community groups have a great deal of local knowledge and it is the affected community which must live with the results. These members say that it is no longer sufficient for any Department/ Agency to say that economic, environmental, or social mistakes are made in ignorance.

There are various priority areas which have long been identified by Government, the bureaucracy and the community, but where it is very difficult to strike the right balance between financial, social and environmental interests. Adequate tools, particularly in relation to community consultation, monitoring and followup, which enable that balance to be more readily arrived at, appear to NCWA's Advisers to be of importance and urgency.

One consultation tool which is frequently used by governments, e.g. Inquiries, via submissions and hearings as they are currently undertaken, appears to our membership to be of doubtful value in relation to thorough or adequate community consultation in relation to the implementation of ESD. Notwithstanding newspaper advertisements, and increasing use of the Internet, the general public is frequently unaware that Government Inquiries are occurring, or is apathetic.

Many individuals feel too intimidated to respond and will not make a submission, because they consider their knowledge base or communication skills are inadequate. Those who do make a submission or attend a Hearing are often those with vested interests and they may take an extreme position. NCWA has been told that it is one of the few organisations to make a submission or give evidence during a Hearing which does not have a specifically vested interest.

A more practical, measurable and less costly method of ensuring community participation appears to be required in relation to consistent input on the social strand of ESD; also the measurement of the effect of Departmental and Agency interventions. One method, notwithstanding the problems associated with such methodology, might be for the Australian Bureau of Statistics (ABS) or similar research institutions, to conduct regular surveys, provided that the Australian public is first educated concerning the importance of their accurate and timely responses to such surveys (with appropriate inducements and sanctions).

Talk-back radio is very popular. It may be possible for Government Departments to use a radio frequency expressly for the purpose of encouraging and obtaining measurable community input on social issues; not in the manner, of current 'Talk-back' programs, but via properly constructed statistical research tools.

In summary NCWA Ltd. considers that a great deal of work has been done within Australia and by agencies world-wide, which can be adapted and used to help ensure that ESD is implemented effectively and efficiently by all Government Departments and Agencies. NCWA Ltd. looks forward with anticipation to the implementation of the recommendations of the Draft Report.

## REFERENCES

Ref. no.

- 3 Carson, Rachel, *A Sense of Wonder*, F. Harper & Row, New York, 1956
- 11 Common, Michael, *Sustainability and Policy : Limits to Economics*, Cambridge University Press, Cambridge, 1995, in Macdonald, Ros, University of Technology, Queensland, Chapter I , unpublished paper;
- 8 CSIRO - Population -development -environment studies, *The Ecumene Project*, 1997, CSIRO Australia.
- 10 Dixon, J.A., & Fallon, L.A., 'The Concept of sustainability; Origins, Extensions and Usefulness for Policy' 1989, *Society and Natural Resources* 73-84 in Macdonald, Ros, University of Technology, Queensland, Chapter 1 , unpublished paper,
- 9 Eckersley, R., *Measuring Progress, Is Life Getting Better?* CSIRO, Australia 1998
- 5 Jellinek, Lea, *The Wheel of Fortune, A History of a Poor Community in Jakarta*, Allan & Unwin, Sydney 1991
- Macdonald, Ros, Faculty of Environmental Law, University of Technology, Queensland, unpublished paper;
- 2 *National Strategy for Ecologically Sustainable Development* AGPS December 1992
- 6 Saul, John Ralston, *The Unconscious Civilization*, New York, Free Press 1997
- 4 Suter, Keith, *World Law and the Last Wilderness*, Friends of the Earth, 2nd. Ed. 1980
- 7 Suter Keith, *Global Agenda, Economics, the Environment and the Nation State*, Albatross NSW, 1980
- 1 World Commission on Environment and Development, *Our Common Future*, (The Brundtland Report) Oxford University Press, New York, 1987

## APPENDIX

The National Council of Women of Australia is a Company, which represents its Constituent Councils. These Constituent Councils have over 470 Affiliated Organisations Australia wide.

National Council of Women of Australian Capital Territory Inc

National Council of Women of Launceston Inc

National Council of Women of New South Wales Inc

National Council of Women of Queensland Inc

National Council of Women of South Australia Inc

National Council of Women of Tasmania Inc

National Council of Women of Victoria Inc

National Council of Women of Western Australia Inc

Note: Attached explanatory brochure on NCWA not able to be scanned. Photocopy available on request.