



## **INQUIRY INTO A SUSTAINABILITY CHARTER**

Submission to the House of Representatives Standing Committee on Environment and Heritage

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### ***Background***

The following submission is from Georgina Legoe of Georgina Legoe Advisory an independent practice, which specialises in providing sustainability advice to the private and public sector.

### ***Introduction***

I would like to applaud the Australian Government for establishing several mechanisms relating to sustainability. The Sustainable Cities report arising from the House of Representatives Standing Committee on Environment and Heritage was a 'report that had to be written' and highlighted many of the issues that need urgent attention.

### ***General Comments***

In terms of the proposed Sustainability Charter, I would like to make some comments and observations, as follows:

- Measurable outcomes on the issues proposed in the discussion paper do address key environmental issues for a sustainable Australia. These are an important start.
- The Charter should also address issues of process, governance, and broaden out the Charter's 'agenda' to include social and economic sustainability- as well as environmental sustainability
- In terms of process the Charter has a great opportunity to speed the uptake of sustainability as a business agenda, which has been slow in the corporate arena to date
- Ideally, the Charter will apply to relevant private sector activities- to go beyond the public sector realm. This comment is based on the assumption that there will be no mandatory sustainability requirements imposed by the current Australian government
- There needs to be clarification as to whether the charter relates only to urban areas. This could be the initial approach, to be followed by a charter that applies at the national level
- If the Charter is to be the basis for policy funding decisions then this 'brief' must be implemented through:
  - All levels of government (as canvassed in the paper)
  - Projects, programmes and initiatives of the Australian government. For example, there will be large investments in infrastructure over the next decades. Currently these projects go through a traditional form of environmental impact assessment. This is narrow, reactive, and piecemeal.



There needs to be a holistic sustainability assessment of infrastructure projects, integrated from the inception stages of infrastructure proposals. The sustainability assessment could be on a project-by-project basis or could be based on a higher-level initial assessment, such as at a regional or sector level. These assessments should focus on identifying opportunities to enhance the environmental, social and economic outcomes of the investment- as well as managing risks.

- The State of Environment Reporting should not be applied as the sole basis for a sustainability charter. As stated above, the Sustainability Charter should embrace a broad range of issues and targets. In addition, the prescriptive nature of SoE Reporting is not applicable in today's more sophisticated sustainability context.

### *Questions for consideration*

#### General

##### 1. Aspirational statements

Comment:

The Charter could have a set of overarching principles but not objectives- government documents tend to be dominated by 'loose' objectives and similar. Instead the Charter should be outcomes focused and specific with targets etc. These can sit under the overarching principles that will act as a reference point for clarification of the latter. Governmental agencies can then identify the strategies and actions (the 'how') to achieve the targets, for that agencies area of activity

##### 2. Research

Comment:

Research if it adds to the knowledge bank could be useful.

##### 3. Standards

Comment:

No specific comment.

##### 4. Decision making integration

Comment:

The above suggestion (re each agency determining their own KPIs etc) could then be rolled out to the different levels of government. In this way, State and local governments can determine the strategies and actions that suit their local environmental/socio-political conditions.

##### 5. Economic cost/gain

Comment:



If the targets are opportunities driven, then the benefits will outweigh the costs. As is demonstrated through the 'green building' research, sustainability if integrated at the commencement of a project is NOT a cost premium.

6. Charter incorporated into SoE reporting

Comment:

This would be a lost opportunity. A significant lost opportunity. As summarised above.

7. National Competition Policy template

Comment:

Yes. I assume that the Public Interest will be the trigger point to the Charter?

8. Awarding of payments

Comment:

No specific comments.

9. Cultural and social value measurement

Comment:

Yes, but also include broader economic issues (in addition to financial).

### Built Environment

As a general comment, there has been a large amount of work undertaken over the last few months to document the business case and critical issues surrounding the built environment. I would refer the Committee to the following documents:

- The Dollars and Sense of Green Buildings 2006. Building the Business Case for Green Commercial Buildings in Australia. Green Building Council of Australia.
- Sustainable Building Pathway. Accelerating transformation in the commercial building sector. Developed at the Sustainable Building Leaders' Project, Feb 2006.

1. Built environment objectives

Comment:

I suggest that the question needs to be re-phrased. The questions should include:

- What are the key impacts of the built environment?
- What key issues arise from consideration of these impacts?
- Where can the Charter have most effect in addressing these issues?
- Where/what are the key opportunities for change through this Charter?
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2. Building infrastructure rating

Comment:

Again, I would refer the Committee to the leading authorities here- GBCA, ASBEC, PCA. I will not address this question in detail, as I would assume that this issue will be canvassed in other submissions.



3. Heritage protection under Charter

Comment:

Relative to a number of other sustainability issues, this issue has been addressed for decades and is well established in regulatory frameworks.

4. Incorporation of building standards, such as 5 star rating system

Comment:

Yes. The Green Star Rating System should be incorporated into the Charter. The GBCA Green Star framework has national traction, is the only national approach, and has attracted market attention.

The above documents have raised the issue of the number of rating tools currently available. There are mechanisms in place to address this, as I am sure will be canvassed in the submission from GBCA.

Water

1. Water quality measurement

Comment:

No specific comment.

2. Targets reducing water consumption, increasing water use or both

Comment:

Preferably both will be addressed in the Charter.

Overall, the assessment should ensure that the funding recipient can demonstrate that an outcome of a more sustainable management approach can be achieved. A holistic sustainability assessment should be undertaken, with social, economic and environmental issues are taken into account.

3. Water catchment health measurement

Comment:

No specific comment, other than the measurement should be holistic, reflecting contemporary approaches to ecosystem management and measurement.

Energy

1. Renewable energy use measurement

Comment:

There is a bigger question that needs to be addressed initially- how can the Charter influence the current investment and dependence on fossil fuel intensive energy sources? Can the Charter include targets aimed at increased energy efficiency and reduced energy consumption targets through projects and programmes?



2. Encouraging increase in use of renewable energy

Comment:

As above, the Charter should have targets and KPIs' aimed at being an investment disincentive for fossil dependant energy sources, and an incentive for renewable sources.

3. Measuring awareness of the social, environmental and economic benefits of energy efficiency and renewable energy

Comment:

There is still a gap between awareness and action. Environmental purchasing behaviour shows that although there may be awareness and a 'desire' to purchase environmentally preferable products, this is not effected at the check out. The real barrier is cost.

Transport

1. Transport system efficiency

Comment:

True environmental costing needs to be integrated into the efficiency assessments.

2. Infrastructure to reduce private transport use, and measurement

Comment:

No specific comment.