

## The proposed Sustainability Charter

The Charter should identify urgent issues, set national objectives, and specify targets and milestones.<sup>1</sup>

- 3.1 There is overwhelming support for the adoption of a Sustainability Charter outlining fundamental values and principles relating to sustainability. It should be seen as a live document open to further modification.
- 3.2 Over 85 percent of the evidence received by this inquiry expressed support for a national Sustainability Charter. In fact, it is advocated by one submitter that the Charter become Australia's second most important document after the Constitution.<sup>2</sup> It is believed that the proposed Charter carries the potential of being the first step to achieving coordinated and centralised leadership towards sustainability<sup>3</sup> (see Chapter 5 for discussion on leadership) and this is important, given the compelling case for urgent action<sup>4</sup> surrounding the diminishing capacity of the world to support current human behaviour and activity.<sup>5</sup> The Committee acknowledges however, that the scope of the proposed Charter can and should extend beyond the realm of the environment.<sup>6</sup>

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1 Australian Conservation Foundation, *Submission no. 93*, p. 12.

2 Sustainable Transport Coalition, Western Australia, *Submission no. 62*, p. 1.

3 ARUP, *Submission no. 73*, p. 2.

4 Australian Business Council for Sustainable Energy, *Submission no. 28*, p. 2; Australian Centre for Environmental Education, *Submission no. 31*, p. 3; Australian Conservation Foundation, *Submission no. 93*, p. 12; Australian Green Development Forum, *Submission no. 66*, p. 1; Mr James Lillis, *Submission no. 32*, p. 5; Pittwater Sustainability Working Group, *Submission no. 37*, pp. 1-2.

5 Association for the Advancement of Sustainable Materials, *Submission no. 101*, p. 7.

6 Ms Kirsten Davies, *Submission no. 11*, p. 1.

## The sustainability agenda

- 3.3 The Committee initially set out to investigate sustainability in the areas of the built environment, water, energy, transport, and ecological footprint but later broadened the scope of its investigation to include the areas of economics, waste, social equity and health and community engagement and education.
- 3.4 The Committee notes that the above mentioned key sectors identified as belonging to the sustainability agenda do not operate in silos.<sup>7</sup> For example, it is widely accepted that carbon dioxide (CO<sub>2</sub>) emissions in the transport sector are linked to adverse health effects.<sup>8</sup> The proposed Charter must integrate the inter-related components of all sectors on the sustainability agenda. However, for ease of reading the Committee summarises the evidence received on the key identified sectors of the sustainability agenda under discrete headings (below).

## Built environment and construction

- 3.5 A wide range of professions within the building industry contributed to the inquiry from the areas of planning, to products and building. Overall, the evidence received indicates industry support for the concept of a Sustainability Charter. Here, the proposed Charter is viewed as an ideal vehicle for advancing sustainability<sup>9</sup> providing neither industry or consumers are burdened with disproportionate and/or unnecessary additional expense.<sup>10</sup>
- 3.6 The Committee has heard that the industry currently operates amidst an extensive suite of sustainability rules applied at the local, state and federal levels of government and reservations are held that the Charter may result in additional regulation that may impact on housing affordability.<sup>11</sup> While this is a valid point, during the course of the inquiry the Committee received evidence that despite the plethora of regulations, there is room for improvement in Australia – in fact, the country is said to be operating below the world average in this sector.<sup>12</sup> According to one witness, the

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7 Australian Association for Environmental Education, *Submission no. 31*, p. 2.

8 Bus Industry Confederation, *Submission no. 85*, p. 21.

9 Built Environment Australia, *Submission no. 27*, p. 3.

10 Real Estate Institute of Australia, *Submission no. 33*, p. 2.

11 Housing Industry Association, *Submission no. 111*, p. 3.

12 Ms Caroline Pidcock, *Transcript of Evidence*, 6 October 2007, p. 23.

Charter has the potential to consolidate and rationalise the multitude of existing regulations.<sup>13</sup>

- 3.7 To improve regulations without jeopardising housing affordability, the Committee has been told that a fair, consistent and performance-based approach should be adopted for drafting the Charter, with the use of cost benefit analysis, regulation impact statements, rewards and full lifecycle assessment principles.<sup>14</sup> Above all, it is contended that any changes to the industry required by the Charter should demonstrate net public benefit.<sup>15</sup>

## Water

- 3.8 Water is undoubtedly a major topic on the sustainability agenda. During the course of the inquiry, the Committee heard that the water industry faces many sustainability challenges including:

- drought
- population growth
- potential climate change threats
- waterways maintenance
- wastewater discharge reduction
- electrical energy reduction.<sup>16</sup>

- 3.9 According to the Water Services Association of Australia, responding to these challenges primarily lies in conserving and diversifying supplies to remove, or at least reduce reliance on reservoirs through stormwater harvesting, water trading, recycling and desalination.<sup>17</sup> The Committee has been made aware that technology overcoming these water challenges exists, but government leadership and community support are required before its use can be expanded and further innovation enabled.<sup>18</sup>

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13 Mr Peter Verwer, *Transcript of Evidence*, 6 October 2007, p. 31.

14 Building Products Innovation Council, *Submission no. 78*, p. 1; Housing Industry Association, *Submission no. 111*, pp. 3-5; Dr Tanya Plant, *Transcript of Evidence*, 6 October 2006, p. 25.

15 Housing Industry Association, *Submission no. 111*, pp. 3, 4, 5.

16 Water Services Association of Australia 2006, 'Issues relating to sustainability in urban water management', *powerpoint slides for private briefing*, Canberra, s. 5. Permission was obtained from the author.

17 Water Services Association of Australia, *private briefing*, 30 November 2006. Permission was obtained from the author.

18 Water Services Association of Australia, 'Refilling the Glass: Exploring the issues surrounding water recycling in Australia', November 2006, pp. 7, 17, 29.

- 3.10 It is advocated that the proposed Charter has the potential to ease conflict between the states and territories over water resource issues such as policy and allocation, but must address the issues of scale and locality.<sup>19</sup> Moreover, it is contended that the Charter would provide an opportunity to guide the management of water resources.<sup>20</sup>

## Energy

- 3.11 With annual growth energy consumption estimates of between 2.5 and 3 per cent and a strong reliance on non-renewable, CO<sub>2</sub> emitting forms of energy, this sector is important to the sustainability agenda.<sup>21</sup> Representatives from the energy industry in Australia claim that sustainable energy technologies and resources exist, but a market driver to guide their use and further development does not.<sup>22</sup>
- 3.12 Highlighted to the Committee is an example of this relating to biomass, a potential renewable energy source that is difficult to promote in a market dominated by the economically cheaper non-renewable black coal.<sup>23</sup> It is argued that if producing black coal was fully costed (ie, inclusive of externalities), the monetary price would likely increase, thereby shifting the marketplace to a more level playing field and in turn, affording renewable energy entrepreneurs an opportunity to compete.<sup>24</sup>
- 3.13 Government policy frameworks, facilitated by the creation and implementation of a Sustainability Charter, are viewed as key factors for driving 'green' energy investments.<sup>25</sup> It is suggested that the Charter encourage a suite of (internationally aligned) energy technology options and policies that create a transition path towards them<sup>26</sup> with pragmatic standards and regulations with straight forward compliance.<sup>27</sup> Moreover, the evidence articulates that the proposed Charter should provide incentives for companies producing renewable energy and reducing

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19 ARUP, *Submission no. 73*, pp. E1, E2.

20 ARUP, *Submission no. 73*, p. E3.

21 Mr Ric Brazzale, *Transcript of Evidence*, 5 October 2006, p. 27.

22 Mr Ian Smart; *Submission no. 88*, pp. 3–5; Mr Ric Brazzale, *Transcript of Evidence*, 5 October 2006, p. 31.

23 Mr Andrew Helps, *Transcript of Evidence*, 5 October 2006, p. 33.

24 Mr Andrew Helps, *Transcript of Evidence*, 5 October 2006, p. 33.

25 Mr Ric Brazzale, *Transcript of Evidence*, 5 October 2006, p. 32; Mr Mark Latham, *Transcript of Evidence*, 5 October 2006, p. 32; Mr Mark Lister, *Transcript of Evidence*, 5 October 2006, p. 32.

26 Mrs Corinna Woolford, *Transcript of Evidence*, 5 October 2006, pp. 33–4.

27 Mr Mark Bezzina, *Transcript of Evidence*, 5 October 2006, p. 36.

energy consumption<sup>28</sup> and include the direct and indirect impact of the built environment and transport on energy use.<sup>29</sup>

## Transport

- 3.14 During the inquiry the transport industry expressed support for a national Sustainability Charter primarily because it could overcome the current decentralised and unsustainable approach to the provision of transport services.<sup>30</sup> Others suggested that the proposed Charter offers an opportunity to facilitate more sustainable forms of transport, as well as land use strategies that reduce the need for travel, particularly by private vehicle and aircraft which are significant air pollutants and contributors to CO<sub>2</sub> emissions.<sup>31</sup>
- 3.15 According to one submitter, the challenge for the transport industry lies in persuading government and business to adopt sustainable transportation systems because these are generally not perceived as viable alternatives to the current systems.<sup>32</sup> However, as indicated by the Bus Industry Confederation, greater reliance on improved public transport has many benefits including reduced traffic congestion, road trauma, CO<sub>2</sub> emissions and air pollution, and increased accessibility for the young, low income earners, women, the elderly and people with disability.<sup>33</sup> This industry views national government leadership and social acceptance of change as integral to the success of sustainability in the transport sector.<sup>34</sup>

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28 Mr Ric Brazzale, *Transcript of Evidence*, 5 October 2006, p. 32.

29 Australian Business Council for Sustainable Energy, *Submission no. 28*, p. 3; LPG Australia, *Submission no. 39*, p. 2.

30 Bus Industry Confederation, *Submission no. 85*, p. 6.

31 Dr Murray May, *Submission no. 16*, p. 4; Bus Industry Confederation, *Submission no. 85*, pp. 21, 23.

32 International Association of Public Transport, *Submission no. 2*, p. 2.

33 Bus Industry Confederation, *Submission no. 85*, pp. 19, 22–3.

34 Mr Michael Apps, *Transcript of Evidence*, 19 October 2006, p. 15; Mr Murray May, *Transcript of Evidence*, 19 October 2006, p. 11; Mr Peter Moore, *Transcript of Evidence*, 19 October 2006, p. 10.

## Ecological footprint

- 3.16 The Committee received evidence in support of and against the incorporation of the concept of the ecological footprint within the Charter. Essentially the ecological footprint is a consumption based metric used to determine the level of human demand on the regenerative capacity of the earth, and whether this demand is within the earth's biological limits.<sup>35</sup> In other words, it is a measurement of the unsustainability of populations from governments, to industry and the community.<sup>36</sup> It is claimed that the measure is most effective when it is supported by actions to redress the balance between the use of natural resources and their availability.<sup>37</sup>
- 3.17 Numerous submitters have argued that the ecological footprint should be part of the proposed Sustainability Charter.<sup>38</sup> They support the use of this tool primarily because of its broad, versatile and global application which facilitates a shared (consumer and producer) responsibility focus that can be used as a basis for developing quantitative measures in the proposed Sustainability Charter.<sup>39</sup> Further benefits of the ecological footprint are described as including scientific credibility, conceptual simplicity, popularity and communicative and educational effectiveness.<sup>40</sup> As taken from a quote contained in one submission: the ecological footprint 'personalises sustainability'.<sup>41</sup>
- 3.18 In contrast, some of the evidence to this inquiry has highlighted limitations to the ecological footprint. For instance, it is argued that the method generally does not offer causes, solutions or projections, nor is it precise<sup>42</sup> and some means of footprint reduction are viewed as socially unjust, potentially supporting unsustainable, inefficient and immoral practices.<sup>43</sup> Moreover, it is claimed that its quantitative nature and ecological focused scope provide no indication of the quality of the environment, nor that of the social and economic elements of

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35 ARUP, *Submission no. 73*, p. C2; Dr Sharon Ede, *Submission no. 68*, p. 1.

36 ARUP, *Submission no. 73*, p. C2; Integrated Sustainability Analysis Group, *Submission no. 47*, p. 1.

37 Nillumbik Shire Council, *Submission no. 56*, p. 2.

38 Dr Sharon Ede, *Submission no. 68*, pp. 4-5; Integrated Sustainability Analysis Group, *Submission no. 47*, p. 1; Mr James Lillis, *Submission no. 32*, p. 2.

39 EcoSTEPS; *Submission no. 25*, p. 2; Integrated Sustainability Analysis Group, *Submission no. 47*, p. 3.

40 ARUP, *Submission no. 73*, p. C2; Mr James Lillis, *Submission no. 32*, p. 2.

41 Dr Sharon Ede, *Submission no. 68*, p. 5.

42 Mr James Lillis, *Submission no. 32*, pp. 2-3.

43 Mr James Lillis, *Submission no. 32*, p. 3.

sustainability.<sup>44</sup> However, the Committee received evidence that new techniques overcoming some of these problems are under development.<sup>45</sup>

## Economics

- 3.19 Government policy concerning economic growth is said to involve increasing both the country's population size and its per capita consumption demands<sup>46</sup> through free market forces and a global economy.<sup>47</sup> One submitter believes our consumer capitalist society encourages affluent lifestyles that are based on the notion that resource use, production and consumption are limitless.<sup>48</sup>
- 3.20 By contrast, another submitter claimed scientific theory dictates that there are indeed limits to growth and we are rapidly exceeding them.<sup>49</sup> Therefore, it is said that the assumption that a healthy economy is a growing economy must be challenged.<sup>50</sup> The evidence argues that government economic policy must realise that the long term environmental (and social) cost of inaction will be far greater to the economy than the cost of immediate action.<sup>51</sup>
- 3.21 According to a witness to the inquiry, the proposed Charter provides an opportunity to correctly align economic signals to encourage competitive neutrality.<sup>52</sup> The Committee has been urged to encourage consideration of ways to create a sustainable economy largely by decoupling the environment and the economy through schemes such as emissions trading or carbon tax;<sup>53</sup> introducing price signals and financial incentives for sustainable behaviour and technology; and ensuring that the cost of externalities is accounted for.<sup>54</sup> Submitters have also argued a case for a

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44 ARUP, *Submission no. 73*, p. C2; Mr James Lillis, *Submission no. 32*, p. 3; Dr Alaric Maude, *Transcript of Evidence*, 8 September 2006, p. 27.

45 Dr Christopher Dey, *Transcript of Evidence*, 6 October 2006, p. 8.

46 Sustainable Population Australia, *Submission no. 22*, p. 2.

47 Dr Murray May, *Submission no. 16*, p. 2.

48 Dr Ted Trainer, *Submission no. 30*, p. 3.

49 Dr Ted Trainer, *Submission no. 30*, p. 1.

50 Uniting Care NSW.ACT, *Submission no. 34*, p. 2.

51 Save Our Suburbs (Ryde District), *Submission no. 10*, p. 6; Mr Mark Lister, *Transcript of Evidence*, 5 October 2006, p. 32.

52 Mr Andre Kaspura, *Transcript of Evidence*, 8 September 2006, p. 3.

53 Environment Business Australia, *Submission no. 72*, p. 2; Mr Graeme Jessup, *Submission no. 53*, p. 3.

54 Mr Mark Lister, *Transcript of Evidence*, 5 October 2006, p. 32.

‘One Planet Economy’ (ie, biophysical budgets, representing each form of critical natural capital).<sup>55</sup>

## Waste

- 3.22 The importance of solid waste management and national resource recovery to the sustainability agenda became apparent during the inquiry. The Australian Council of Recyclers claims that each Australian is estimated to generate 1.6 tonnes of waste per year and that society needs to transform from being ‘throw away’ oriented, to ‘recycling and resource recovery’ oriented through the principles of biomimicry.<sup>56</sup>
- 3.23 GRD Limited advocates that mechanical biological treatment of waste is environmentally superior to landfill, providing sustainability outcomes in a multitude of areas, such as the built environment, water, energy and the ecological footprint.<sup>57</sup> The Urban Resource - Reduction, Recovery, Recycling (UR-3R) Urban Waste Management Facility at Eastern Creek, Sydney is a proven example of this, converting about 10 per cent of the State’s urban waste into useful resources such as renewable energy and organic growth media.<sup>58</sup> Moreover, some businesses are internally applying biomimetic principles by recycling and remanufacturing throughout their entire production process, including putting sustainability at the forefront of their procurement choices.<sup>59</sup>
- 3.24 It is advocated that a Sustainability Charter, accompanied by a government-led public awareness campaign, would provide an opportunity for a much needed coordinated approach to maximising resource recovery and improving resource efficiency.<sup>60</sup> Key suggestions for inclusions on waste in the proposed Charter are transitional step targets and measurement tools, market based instruments such as a cap and trade incentive scheme, meaningful landfill taxes and decreased taxes on residues for biodegradable material.<sup>61</sup>

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55 Professor Graham Harris, Professor Manfred Lenzen & Mr Richard Sanders, *Submission no. 95*, pp. 1–2. See also Ms Sharon Ede, *Submission no. 68*, pp. 1, 4.

56 Australian Council of Recyclers, *Submission no. 81*, p. 4.

57 GRD Ltd, *Submission no. 55*, pp. 2, 5.

58 GRD Ltd, *Submission no. 55*, p. 2.

59 Fuji Xerox Australia Pty Ltd, *Submission no. 83*, p. 2; Mr Ramsay Moodie, *Transcript of Evidence*, 6 October 2006, p. 32.

60 Australian Council of Recyclers, *Submission no. 81*, p. 6; GRD Ltd, *Submission no. 55*, p. 12.

61 Australian Council of Recyclers, *Submission no. 81*, p. 11; GRD Ltd, *Submission no. 55*, p. 12.



## Social equity and health

- 3.25 Throughout the evidence in this inquiry, social equity and health are argued as being important, if not central to the sustainability agenda.<sup>62</sup> In this sector, concern lies in the perception that the discussion surrounding sustainability is preoccupied with continuing and improving economic systems when it should instead be with continuing and improving life-support systems.<sup>63</sup>
- 3.26 Social equity and health concern quality of life. This sector has tangible aspects relating to physical health and well-being including clean air and water, safe urban environment, suitable housing, access to public amenities and employment and educational opportunities.<sup>64</sup> It also has intangible aspects relating to mental health and spiritual well-being, including cultural and social opportunities.<sup>65</sup>
- 3.27 Cultural well-being encourages a long concept of time perspective, which is an appropriate mindset for devising the proposed Sustainability Charter because, as suggested by one witness, it works beyond the short term annual reporting and parliamentary timeframes.<sup>66</sup> It is also argued that important to the success of the Charter is collaboration of 'ordinary' people – including those with disability and the elderly – in its creation to ensure the diverse range of welfare needs of current and future generations is covered.<sup>67</sup> One witness proposes that population reduction, or at least control, is also critical to the sustainability challenge.<sup>68</sup>

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62 City of Joondalup, *Submission no. 15*, p. 1; Earth Charter Australia, *Submission no. 12*, p. 5; Sustainable Population Australia, *Submission no. 22*, p. 2; Sydney West Area Health Service, *Submission no. 79*, p. 1; Vinyl Council of Australia, *Submission no. 29*, p. 1, among others.

63 Professor Anthony Capon on behalf of Professor Anthony McMichael, *Transcript of Evidence*, 2 November 2006, p. 2; Dr John Coulter, *Transcript of Evidence*, 2 November 2006, p. 14.

64 Professor Anthony Capon, *Transcript of Evidence*, 2 November 2006, p. 4.

65 Mr Peter Phillips, *Transcript of Evidence*, 2 November 2006, p. 5.

66 Mr Peter Phillips, *Transcript of Evidence*, 2 November 2006, pp. 6, 8.

67 Mr Dougie Herd, *Transcript of Evidence*, 2 November 2006, p. 10.

68 Dr John Coulter, *Transcript of Evidence*, 2 November 2006, p. 12.

## Community engagement and education

- 3.28 One witness contends that given no country is sustainable, there is an absence of sustainability curriculum content to utilise, which essentially makes sustainability an ongoing 'learn by doing' process.<sup>69</sup> A submitter proposes that as a first step, a concerted effort to educate the community at large is required.<sup>70</sup>
- 3.29 A key problem concerning education for sustainability and community engagement is claimed to relate to communication.<sup>71</sup> Several witnesses to the inquiry express concern about increasing levels of messages aimed at raising awareness on issues on the sustainability agenda that do not provide a connection between knowing and doing, nor target the needs of different demographics and contexts.<sup>72</sup> A further problem is said to relate to the perceived absence of government leadership, where it is suggested that any positive steps taken by the community towards sustainability can feel insignificant when government agencies are not seen to be doing the same.<sup>73</sup>
- 3.30 In this sense, the Committee believes that the proposed Sustainability Charter is critical because it carries the potential to create an opportunity for education on the concept and importance of sustainability. Further, in the Committee's view, the Charter will also provide clear direction to government, industry and the community concerning Australia's desired future and facilitate coordinated, collective ways of achieving it. As one witness contends, the Charter will create a much needed public policy context conducive to education for sustainability and community engagement.<sup>74</sup>

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69 Professor Daniella Tilbury, *Transcript of Evidence*, 24 May 2007, pp. 1-2.

70 Save Our Suburbs (Ryde District), *Submission no. 10*, p. 5.

71 Ms Sophie Constance, *Transcript of Evidence*, 24 May 2007, p. 8.

72 Mr Grahame Collier, *Transcript of Evidence*, 24 May 2007, p. 12; Ms Sophie Constance, *Transcript of Evidence*, 24 May 2007, p. 11; Professor Daniella Tilbury, *Transcript of Evidence*, 24 May 2007, p. 11.

73 Professor Daniella Tilbury, *Transcript of Evidence*, 24 May 2007, p. 10.

74 Mr Grahame Collier, *Transcript of Evidence*, 24 May 2007, p. 9.

## The Committee's position

- 3.31 The Committee acknowledges that the scope of sustainability is broad, perhaps even broader than the areas investigated, and certainly more detailed and complex. It also recognises the interdependency of the areas on the sustainability agenda.
- 3.32 While the Committee is not in a position to determine the scope of the sustainability agenda it believes that the proposed Sustainability Commission, if supported by an appropriate framework (see Chapter 5), would have the (collaborative) expertise to do so. At a minimum, the proposed Charter could cover the areas investigated by the Committee and integrate the inter-related components.

## Aspirations versus targets

- 3.33 In its *Discussion Paper*, the Committee considered the use of aspirational statements, set targets, or both in the proposed Sustainability Charter. It has been suggested that the Charter be an aspirational head document, accompanied by a separate, more detailed supplementary document containing implementation strategies with measurable targets.<sup>75</sup>
- 3.34 Generally the evidence indicates that if Australians are to engage in the transition towards sustainability, the Charter needs to be aspirational.<sup>76</sup> As suggested by one submitter, it is likely that Australians will be responsive to a pictorial and/or textual document that clearly and succinctly provides the overall direction required for advancing sustainability.<sup>77</sup> At most, it should state what sustainability means to Australia, with visionary overarching objectives (and milestones) covering the issues on the sustainability agenda that are significant to this country, yet be consistent with international initiatives.

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75 EcoSTEPS, *Submission no. 25*, p. 2; Real Estate Institute of Australia, *Submission no. 33*, p. 2; Associate Professor Terry Williamson and Mr Bruce Beauchamp, *Submission no. 96*, p. 5.

76 City of Joondalup, *Submission no. 15*, p. 1; EcoSTEPS, *Submission no. 25*, p. 2; Real Estate Institute of Australia, *Submission no. 33*, p. 2; Sutherland Shire Council, *Submission no. 46*, p. 2.

77 Mr Graeme Jessup, *Submission no. 53*, p. 2.

- 3.35 However, on its own an aspirational Sustainability Charter is not viewed by some as being a sufficient mechanism to provide unequivocal, concrete direction to the government, industry and community.<sup>78</sup> According to one submitter, an aspirational Charter may not instigate appropriate action, nor provide a baseline for measuring progress.<sup>79</sup> Key, scientifically credible, long term, measurable and achievable national targets (linked to the Charter's aims and objectives) are said to more likely result in tangible sustainability outcomes.<sup>80</sup> According to some of the evidence, these targets will only be useful if linked to regulation and funded policies and programs.<sup>81</sup>

### The Committee's position

- 3.36 The Committee believes that the proposed Sustainability Charter should be aspirational. People should be encouraged to use it through incentives, rather than through regulation. It should pictorially and/or textually and concisely illustrate what sustainability means to Australia, with visionary overarching objectives (and milestones) covering the issues on the sustainability agenda that are significant to this country.
- 3.37 Supplementary, but no less important to the Charter, the Committee proposes that a technical implementation agreement containing key, meaningful, long term, measurable and achievable national targets be produced collaboratively. This supplement should be closely aligned with the objectives of the Charter and used primarily by government and industry to advance tangible sustainability outcomes through self-initiated strategies, tactics and tools, under the guidance of the Sustainability Commission.

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78 Real Estate Institute of Australia, *Submission no. 33*, p. 1; Sutherland Shire Council, *Submission no. 46*, p. 2.

79 Real Estate Institute of Australia, *Submission no. 33*, p. 1.

80 City of Melbourne, *Submission no. 67*, p. 1.

81 Dr Gabrielle Kuiper, *Submission no. 92*, p. 1.