

12.1 Draft Environmental Sustainability Strategy – SCHEDULE OF SUBMISSIONS

Summary of Comments Received	Officer Response	Officer Recommendation
1. Morne HATTINGH (Previous staff member)		
1.1 The document says we provide free kerbside rubbish and recycling service, which is not true as we charge for that. We do provide free access to the waste facilities at 7 Mile and Wickham transfer Stations.	Kerbside rubbish and recycling is charged via property rates.	Supported.
2. Annabelle LITTLE (Community member)		
2.1 The submission provides excellent considerations to the natural environment; however, would you please consider adding the following. 1. Review of chemical usage throughout the City: a. Removal of blanket spraying on verges and swale drains. b. Consideration of residual build-up of chemicals. c. Alternative solutions/use of chemical as a last resort.	The draft Strategy recommends in Focus Area 4 – Natural Environment, to develop a Weed Management Strategy. Weed Management Strategies include a range of weed treatments including chemical herbicides and non-chemical treatments. The City is currently procuring a Consultant to develop this Strategy herbicide use and management is within the scope.	Noted – Provide the applicant with a copy of the Weed Management Strategy when complete.
2.2. Weed management: a. Targeted programs to remove weed species throughout the City. b. In consideration of point 1.	The Weed Management Strategy will address Weeds Of National Significance, notifiable weeds and other invasive species.	Noted. See above.
2.3. Consideration of tree protection orders and approvals for removal: a. In light of how many trees were lost in the cyclone. b. Removal cultural practices of trees being poisoned or cut down.	The City has a Tree Policy, and this is due for review. In addition, the draft Strategy specifically mentions the review of the City's Tree Policy.	Noted – When complete, provide copy of the updated Tree policy to the Applicant.
2.4. Protection of our remnant native bushland during development including during road constructions and in swale drains.	The City includes this requirements within the Procurement Scope for City Infrastructure works.	Supported.
2.5. Protection of our swale drains and oceans: a. No natural filtration systems in drains. b. Use of natural plantings and landscape as filters to remove waste into oceans.	The draft Strategy addresses protection of remnant bushland on the shoulders and upper batters of drainage swales to prevent erosion, support biodiversity and improve amenity. The base of swale drains needs to be clear of large shrubs and trees to enable water egress. The City practice is to slash grasses to leave significant stubble to reduce erosion and improve filtration but not impair flow.	Noted.
3. Amy FRANCIS (Environmental Sustainability Advisory Group)		
3.1 I feel like what's missing from the document is key measurable targets. I see there are objectives and then it breaks down into strategies but there's no overarching measurable target for each focus area ... like Net Zero carbon emissions by 2030 for example..or zero emissions from city's light vehicle fleet by 2025...	The document has objectives but no fixed targets. The City does not currently have the systems in place to do baseline measurement of emissions and other sustainability indicators, and such, setting targets is viewed as premature. The document proposes that the City conduct baseline carbon accounting AND set targets as a priority action. Accountability will be demonstrated through progress of the implementation plan.	Noted. Recommend making reference to the WA Climate Policy 2020 and how the City's Strategy contributes towards achieving Net Zero carbon emissions by 2050.
3.2 The strategies themselves I've just skimmed over I'm sure the Sustainability Officer has done great on those but does it really mean anything if there's a disclaimer on page 19 that's says actions will be	The draft Strategy briefly outlined how the actions would be prioritised and implemented only. As a result, an implementation plan has been developed to address this.	Supported – An Implementation Plan is under development and will outline

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prioritised by city's "capacity to deliver, ease of implementation' etc... the city could end up reducing their emissions by 1% in 10 years.. and they'd be achieving that focus areas objectives... am I being overly ideological to believe if the city is going to the effort of having a sustainability strategy, why not aim high and lock it in so the city is accountable ... This is such an incredible opportunity to really make something good happen when the city is in a growth phase too, to be able to just do it right the first time.		how the Strategy will be delivered.
3.3 I also have another suggestion in relation to sustainable housing.... I am aware the City is planning on investing in housing to cushion a housing shortage during the next boom phase. Please could the City's housing investment go straight to being a demonstration eco village... With all the latest technologies/designs and building materials and energy/water storage and efficiencies, micro grid power and all that jazz... It would be amazing. Show everyone it doesn't have to be Tin houses, fake grass and air-conditioning to be "livable". There must be a million sustainable housing start-ups that would love the opportunity to bid for the City's money.	The draft Strategy in Focus area 5 – Sustainable Development, Planning and Infrastructure outlines the areas the City can influence and show leadership in this space. There is limited scope to mandate these initiatives, however the review of the City's Procurement Policy will assist in addressing this point.	Noted.
4. Martin SALM (Rio Tinto Environment Superintendent)		
4.1. Page 2 Acknowledgements: The City of Karratha extends beyond Ngarluma traditional lands which is not reflected in the Acknowledgments.	The current Strategy only refers to Ngarluma, however this should be extended to other Traditional Owner groups in the local government area.	Supported.
4.2. Page 31 Water: Remove first sentence "Western Australian's waste generation rates are higher and recovery" which is included in error from section 2.	The sentence is duplicated from a previous section of the draft Strategy. It is included in error.	Supported.
4.3. Page 31 Water: The West Pilbara Water Supply Scheme also sources water from Bungaroo Borefield.	The Strategy incorrectly refers to the Millstream only and does not mention Bungaroo Borefield.	Supported.
4.4. Page 31 Water: The City could consider adding in "automation to enable the detection water leaks in a timely manner" under 'smart metering'.	The draft Strategy does refer to expanding the SCADA control system which requires smart metering, however not specifically mentioned.	Supported – Recommend specifically mentioning smart metering.
5. Justine SCHULTZ (Department of Water & Environmental Regulation)		
5.1 It is a great document, and DWER does not have any comments to make at this time. Thank you for sending it through.	Nil	Noted.
6. Clancie WEBSTER (Water Corporation)		
6.1 Thanks, this is a good read. Would it be possible to get a bit more info on the councils weed mapping and management plan, the Report it application and the Environment and Sustainability Advisory Group?	The City is willing to share information on the Report-It App, the Environmental Sustainability Advisory Group and the intention to develop a weed management plan.	Supported – Provide Applicant with a copy of the Weed Management Plan when complete.
7. Peta MOTT (Karratha Community Association)		

12.1 Draft Environmental Sustainability Strategy – SCHEDULE OF SUBMISSIONS		
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7.1 I read the draft plan and sent it to members to review. The KCA has no comments but do endorse the plan as per the attached.	Nil	Noted.
8. David PICKLES (Department of Biodiversity, Conservation & Attractions)		
8.1 Thank you for providing the department with the opportunity to review the City's Draft Environmental Sustainability Strategy. The department supports the City's strategy and direction and looks further to its development and implementation, however, at this time has no comments to make concerning its roles and responsibilities under the <i>Conservation and Land Management Act 1984</i> and <i>Biodiversity Conservation Act 2016</i> .	Nil	Noted.
9. Brian WALL (Murujuga Aboriginal Corporation)		
9.1 Concerned about the protection of heritage, industry impacts on the rock art and weed management. Keen to progress partnerships for natural area management, especially near Murujuga (e.g., Hearsons Cove Management Plan). (Verbal discussion)	<p>The draft Strategy includes a recommendation within Focus Area 4 – Natural Environment #4.19 to 'Engage with Traditional Owners to incorporate traditional knowledge in the management and protection of natural areas.' It does not stipulate commercial opportunities for Traditional Owner management of natural areas.</p> <p>The draft Strategy includes a recommendation to develop a Weed Management Plan which will also address collaboration with other landholders.</p>	<p>Supported – Recommend strengthening the wording to engage with Traditional Owner groups to explore partnership opportunities.</p> <p>Noted.</p>
10. Phil DAVIES (Yindjibarndi Aboriginal Corporation)		
10.1 Mindful of boundaries between Yindjibarndi and other traditional owner groups and how this impacts which groups are involved in the Strategy. Interested in protection of culture, heritage, and opportunities to partner with caring for country within LG. (Verbal discussion).	<p>The current Strategy only refers to Ngarluma, however this should be extended to other Traditional Owner groups in the local government area.</p> <p>The draft Strategy includes a recommendation within Focus Area 4 – Natural Environment #4.19 to 'Engage with Traditional Owners to incorporate traditional knowledge in the management and protection of natural areas.' It does not stipulate commercial opportunities for Traditional Owner management of natural areas.</p>	<p>Supported – include other Traditional Owner groups.</p> <p>Supported – Recommend strengthening the wording to engage with Traditional Owner groups and explore partnership opportunities.</p>
11. Vicki LONG (Environmental Sustainability Advisory Group) SUBMISSION 1		
<u>Verbal feedback at ESAG meeting</u> 11.1 The document needs a scope statement and a map of the LG area.	The draft Strategy does include a scope definition; however, the wording can be clarified. The draft Strategy does not currently include a map.	Supported – Recommend including a scope statement in the 'Our approach to environmental sustainability' paragraph and include a map.

12.1 Draft Environmental Sustainability Strategy – SCHEDULE OF SUBMISSIONS

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11.2 Needs acknowledgement of the multicultural nature of the community and their contributions.	The draft Strategy includes mention of the Ngarluma Traditional Owners (TO), however, does not extend to specifically mention the broader multicultural nature of the community.	Supported – Recommend including other TO groups and mention the multicultural nature of the community.
11.3 Greater emphasis on managing weeds.	The draft Strategy recommends in Focus Area 4 – Natural Environment, to develop a Weed Management Strategy, however the wording in the description of the threats to the Natural Environment omits to mention the spread of weeds as a threatening process.	Supported – Recommend including in the Natural Area introductory information.
<u>Email feedback</u> 11.4 Page 3 Mayor's Forward. Paragraph 5 - A stronger statement would be "The City is located within a national diversity hotspot...."	Editorial feedback.	Supported.
11.5 Page 4. Acknowledgements – Fix this sentence to read properly.	Editorial feedback.	Supported.
11.6 Page 6. The word "enhancing" is vague and doesn't necessarily mean the natural environment will be conserved. Maybe the wording needs to be "with conserving our natural and enhancing our urban environments"	The draft Strategy does aim to articulate this; however this wording is an editorial improvement.	Supported.
11.7 Page 9. Duplication of the sentence regard the social, cultural, economic and environment values.	Editorial feedback.	Supported.
11.8 Page 10. Paragraph on culture needs to be re-written as repetitive.	Editorial feedback.	Supported.
11.9 Page 15. Consider the cumulative impact of the loss of landform/habitat/vegetation type from the City, considering past and proposed developments for renewable energy and other proposals.	This is considered in Focus Area 5 – Sustainable development and the need for criteria to trigger a sustainability review of developments.	Supported.
11.10 Page 24. Consider specifying that weeds are the most significant threat to the environment after climate change (IUCN Outlook Report) - any direct or indirect disturbance needs to be managed to reduce the introduction and spread of weeds which will develop subsequent to that disturbance.	The threat of weeds and the development of a Weed Management Plan has been included in the actions, however the significance of weeds as a threatening process can be strengthened.	Supported.
11.11 Page 25. Action 4.2 Planning of developments should include a baseline report to understand what weed species are present. Planning should also include the cumulative impacts of loss of landform, habitat and vegetation type with developments.	This is covered under the EPA requirements for Clearing Permits.	Noted.
11.12 Page 25. Actions 4.5; 4.6; & 4.7 all need a stronger commitment to remove weeds.	The threat of weeds and the development of a Weed Management Plan has been included in the actions, however the significance of weeds as a threatening process can be strengthened in each area.	Supported.
11.13 Page 26 - 14.7 in Natural Environment. Suggest including an education campaign to educate all businesses and residents on the destructiveness of weeds.	The threat of weeds and the development of a Weed Management Plan has been included in the actions. The Weed Management Plan includes a communication program to educate the community on weeds.	Supported.

12.1 Draft Environmental Sustainability Strategy – SCHEDULE OF SUBMISSIONS		
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12. Dr Ken MULVANEY (Environmental Sustainability Advisory Group)		
Verbal feedback at ESAG Meeting: 12.1 Check the distances quoted for the coastline as they are inaccurate.	The draft Strategy does incorrectly reference the length of the coastline.	Supported – Recommend correction.
12.2. Traditional Owners in the LGA is more than Ngarluma and need to include Yaburara, Mardudhunera and Yindjibarndi.	The current Strategy only refers to Ngarluma, however this should be extended to other Traditional Owner groups in the local government area.	Supported – Recommend correction.
12.3 Check wording of the Indigenous population as being the longest continuous culture not the oldest living culture as this is not accurate.	The wording in the draft Strategy is inaccurate.	Supported – Recommend correction.
12.4 Document contains actions, but these are referred to as strategies and needs changing.	The draft Strategy contains strategies, objectives, and actions and in places are used incorrectly. The draft Strategy will also have an Implementation plan where the actions will be clearly described.	Supported – Recommend consistent terminology.
12.5 Photos need captions.	The draft is a concept document, and the final will be a higher resolution with captions.	Supported.
Email feedback 12.6 Page 7 – Definition of sustainability is unrealistic. The area is not able to replenish resources removed from the area.	The draft Strategy proposes a well-accepted definition of sustainability, which is to balance the economy, society and the environment recognising they all influence sustainability. The sustainability of the mining industry is regulated by the Environmental Protection Agency and the City has limited influence on the industry.	Noted.
12.7 Pages 8 & 11 - Infographics difficult to read, font size too small and missing numbers.	The draft Strategy was developed as a low-resolution word document, the final document will have high resolution infographics.	Supported.
12.8 Page 12 - The Strategic Community Plan needs to reference cultural environment and not just natural and built environment.	The Strategic Community Plan does reference culture; however this is outside the scope of the draft Environmental Sustainability Strategy.	Noted.
12.9 Page 13 - Commented if the ESS is a guide or to enforce. Questioned if an annual report is sufficient to report progress. Questioned the background, experience or support the Sustainability Officer to report on progress.	The draft Environmental Strategy is a plan rather than a tool for mandatory legislative compliance. The draft Strategy and the Implementation Plan are considered a live documents and progress will be reviewed yearly in an annual sustainability report. The Sustainability Officer is a qualified professional and forms part of a City Growth team that includes sustainability in many functions.	Noted.
12.10 Page 14 - Photos of Millstream are in Shire of Ashburton.	The use of photographs from the Millstream National Park is common in many strategic documents. These photos are included to celebrate the variety of natural landscapes within the region.	Supported – Recommend including images of natural areas within the local government area where possible.
12.11 Page 15 - 'About Our Region'. This needs rewriting. Include social, artistic values along with cultural and heritage values. City of Karratha is not surrounded by National Parks. Murujuga NP is part	The draft Strategy does incorrectly reference the length of the coastline and major landmarks that indicate the natural boundaries of the local government area.	Supported – Recommend correction.

12.1 Draft Environmental Sustainability Strategy – SCHEDULE OF SUBMISSIONS

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of Burrup not including ... (sentence incomplete). Clarify the length of the coastline (260 or 320km). Quoted distance excludes Weld Island, Depuch Island, Port Weld and Balla Balla Creek. Dampier Archipelago included, but not the others like MonteBello Islands etc		
12.12 Page 16 - 'Population': Question about the reference to age category. 'Culture': refers to more than Ngarluma connection - include Yindjibarndi, Mardudhunera and Nhuwala. Poorly worded. 'Economy': need to acknowledge pearling & whaling, not just agriculture. Very little extraction happens in LGA, more export/processing hub. Specify rail is 'private' rail.	The current Strategy only refers to Ngarluma, however this should be extended to other Traditional Owner groups in the local government area. Other points regarding pearling, whaling and pastoralism are not mentioned.	Supported – Recommend including other Traditional Owner groups, and references to pearling, whaling and pastoralism.
12.13 Page 19. Why the City adopts one role out of a choice of three (deliver, enable, advocate). Why only one if there are three options.	The draft Strategy articulates the City's role and scope with addressing each area. The dominant role has been chosen with each initiative.	Noted – Recommend including this definition in the explanatory information.\
12.14 Page 21. Questioned the inclusion of a PDC reference when few other sources have been listed	Use of references are sparse.	Supported – Recommend deleting that reference.
12.15 Page 22. The use of the term 'Strategies' is incorrect. They are 'actions.'	The draft Strategy contains strategies, objectives, and actions and in places are used incorrectly. The draft Strategy will also have an Implementation plan where the actions will be clearly described.	Supported – Recommend consistent terminology.
12.16 Page 27. Suggest changing 'avoid' waste to 'not generating waste'.	The draft Strategy aims to promote avoiding waste as the first step in managing waste in the community.	Noted.
12.17 Page 31. First sentence refers to the waste section which is an error. Change 'central and eastern parts' to 'inland'. Change the reference to 'effects' of climate change to 'expected/predicted effects.' Change rainfall from 'significant' to 'intensive' rainfall events. Include Bungaroo Borefield.	The sentence is duplicated from a previous section of the draft Strategy. It is included in error.	Supported.
12.18 Page 35. Mentions the culture as an asset, however no other mention since first section.	Protection of culture and other social factors is outside the scope of this draft Strategy.	Noted.
12.19 Page 35. Threats to the environment should also include pastoral and fishing.	Pastoral impacts and fishing are not mentioned and should be.	Supported.
12.20 Page 36. Questions the need for an urban forest plan given the arid environment.	The term Urban Forest Plan refers to the ability to manage tree canopy cover for amenity, shade, urban cooling, liveability, and biodiversity within the built environment. The term 'Urban Forest' will be replaced with 'Tree Policy' which addresses the same subject.	Noted.
12.21 Page 36. No mention of feral animals, only weeds.	Action 4.18 in the Natural Environment focus area specifically mentions introduced flora and fauna.	Rejected.
12.22 Page 37. Change 'Traditional knowledge' to 'traditional cultural knowledge'.	Clarification accepted.	Supported.

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12.23 Page 39. Insert 'or' when striking a balance between economic growth, social wellbeing and care for the environment.	This is contrary to the accepted definition of sustainability where there is interaction between the economy, society, and the environment.	Noted.
12.24 Page 42. Change 'this strategy' to 'this document'. Change 'future actions' to 'future activities'.	Clarification accepted.	Supported.