



Government Discussion Paper Summary

Response to the NSW Government Environmental Education Discussion Paper, on behalf of Board for Social Responsibility, NSW Synod, Uniting Church in Australia. March 1997

The NSW Government has released a Green Paper entitled *A new approach to environmental education in NSW*. It invites public submissions by 11 April 1997. We were sent copies of the paper by the EPA (Environmental Protection Authority). The paper looks at current scope of environmental education in NSW, the limits of that education, and the need for a new approach, as a means of achieving the following vision:

A high quality, integrated and effective system which ensures that all stakeholders have a role in planning, delivering and evaluating strategic environmental educational for ecologically sustainable development in NSW.

It then proposes that a new Council on Environmental Education be established, which would include representatives of several government departments, industry, unions, local government, and community and tertiary education. It would be chaired by the representative of the Environmental Protection Authority and be serviced by the EPA. It would develop a three year strategic plan of environmental education. Each agency would be responsible for implementing the section of the plan relevant to it - financial resources would come from within each agency's budget. The council would then monitor the implementation of the plan, and provide advice about environmental education to government.

Note: This response includes both a general submission and response to the questions set out on the "Comment Form".

Part 1 General submission

Introduction

The Board for Social Responsibility responds to this paper for several reasons. First, the Uniting Church in Australia has a strong commitment to ecologically sustainable development, which flows from our belief that God created this world and all its creatures, and declared it all very good. We believe that the earth and its biosphere have value in their own right, and that they are also given to all humankind for all generations to enjoy, care for, and use as is necessary to meet human need.

The second reason is that the church has general expertise in the area of personal, social and professional ethics, all of which are involved in environmental issues.

A third reason for this response is that the Uniting Church is an institution with some expertise in diverse forms of education, ranging from the informal and the short term, for volunteers, through to professional education.

This submission is supportive of the Government's "vision statement" articulated in the Green Paper, namely

A high quality, integrated and effective system which ensures that all stakeholders have a role in planning, delivering and evaluating strategic environmental educational for ecologically sustainable development in NSW.

Our criticisms of the Green Paper are not intended to undermine this overall proposal, but rather to contribute to the more rigorous thinking about environmental

education that is necessary if NSW is to adopt an effective strategic plan.

The comments made in this paper are based on two elements of the government's vision: "that education be 'strategic'", and that it be for the purpose of achieving "ecologically sustainable development".

General comments on Environmental Education

The importance of environmental education

The Board welcomes the paper and the emphasis on educating the whole community in ecological responsibility. We see the church as having a role to play in raising the awareness of church members to the importance of the issues, through our normal processes of education, provision of liturgical resources, and so on. However, we believe that a strategic plan for environmental education as part of the commitment to the National Ecologically Sustainable Development Strategy needs to ensure that there is both general community environmental education and more specific, rigorous, technical environmental education to enable people to fulfil their work and professional responsibilities in a way which contributes to rather than working against ecologically sustainable development.

Environmental education as an ethical and spiritual matter

Environmental education should not be merely about self-preservation or avoiding prosecution. Environmental education that is based on fear or a grudging acceptance of legal requirements is likely to be limited in its long term effectiveness, compared to education that encourages people to a genuine awareness of the biological world of which they are a part, and of their ethical responsibility to the other people who share that world. Environmental education is not merely about technical matters and legal requirements, but about fundamental human values and social relationships.

The Uniting Church sees environmental responsibility as both an ethical and spiritual matter. Commitment to the "common good", an awareness of interdependence, and the belief that all living things are valuable provides an important basis for people thinking creatively about the practical issues. In our view, environmental education needs an ethical component.

This ethical dimension seems to be lacking from the Green Paper.

Who needs environmental education?

The Discussion Paper seems to focus mainly on community education. We agree that it is important to educate the community generally, so that people modify their lifestyle and make appropriate day to day decisions about consumption, waste disposal, and so on.

However, it is clear that some people have a lot more decision-making power than others, and need much better and more precise environmental education than the general community if they are to make environmentally responsible decisions. To make a significant difference, environmental education must include strategies which focus on those who make key, large scale decisions - business executives, public sector bureaucrats and politicians (at all three levels of government). These decision-makers need a holistic view of the impact of their decisions on the environment and on society. This is not only about those involved in environmental and planning portfolios, but those who make any of the wide range of decisions which affect environment.

It is not enough to have a national Ecologically Sustainable Development Strategy. There needs to be understanding and commitment to the strategy throughout government and the public sector, so that it provides a basic framework for all policy making.

We therefore have some reservations about the proposals in the Discussion Paper for the establishment of one council representing several sectors, to prepare an overall strategic plan. *We support the concept of a strategic plan, but question whether the process being proposed is adequate.*

The strategic plan needs to include clearly delineated strategies for educating not only the general community, but key decision makers and practitioners. This is already recognised to some extent by the EPA, eg in its special programs for small and medium businesses, but it is not clear enough in the Discussion Paper, where industry and community needs are mixed together and the needs of many decision makers are not specifically addressed at all.

The National ESD Strategy itself recognises that ESD encompasses a wide range of decision making, including less obvious policy areas such as taxation and pricing, and public health.

The Brundlandt Report, *Our Common Future*, comments:

The integrated and interdependent nature of the new challenges and issues contrasts sharply with the nature of the institutions that exist today. These institutions tend to be independent, fragmented, and working to relatively narrow mandates with closed decision processes. Those responsible for managing natural resources and protecting the environment are institutionally separated from those responsible for managing the economy. The real world of interlocked economic and ecological systems will not change; the policies and institutions concerned must.

Environmental protection and sustainable development must be an integral part of the mandates of all agencies of governments, of international institutions, and of major private sector institutions. (page 310, 312)

Example 1: Under the previous NSW government, the paper on the proposed strategy for road transport showed no integration between the section on ESD and other parts of the document, such as the section on costs. ESD was seen as specialist knowledge, rather than as a framework for the strategic work of the RTA. This led to an inadequate and contradictory paper.

Example 2: Air and water pollution have an impact on health, which means that decisions made concerning road transport, water management and agriculture, *inter alia*, can have a significant impact on the health. It is an abuse of human rights, and extraordinary economic inefficiency, to create unnecessary health problems through environmentally insensitive decisions in such portfolios, and then spend scarce health dollars treating symptoms that could have been avoided.

Article 12 of the International Covenant on Economic Social and Cultural Rights includes:

The States Parties to the present Covenant recognise the right of everyone to the enjoyment of the highest attainable standard of physical and mental health.

The steps to be taken by the States parties to the present Covenant to achieve the full realisation of this right shall include those necessary for:

(b) The improvement of all aspects of environmental and industrial hygiene.

This means that there is a need to educate people in a range of government departments whose policies result, either directly or indirectly, in environmental impacts which in turn affect people's health.

Example 3: The hostile debate over old growth forests arose because some stakeholders in both industry and government did not understand the nature of ecosystems or the concept of ecologically sustainable development, ie the maintenance of ecosystems, as distinct from sustainable harvesting of forestry products.

Example 4: As the Discussion Paper itself suggests on page 27, many economists are unaware of ecology and the needs of the biosphere and do not understand that competition policy is not everything. Bad government decisions are made when they are driven by treasury officials who have no awareness of how biological communities work.

Table 4 of the Discussion Paper (page 14) lists "Government agencies with a significant environmental education role". However, our point is that the policy formulations of all these agencies have significant environmental implications, so that these agencies should also be seen as having a significant internal environmental education need.

Example 5: Some developers seem to see Environmental Impact Assessment as a barrier, rather than as a reasonable expectation based on the wellbeing of the whole community. Councils incur high court costs defending their attempts to be environmentally responsible because developers do not understand, or do not want to understand, the wider issues. Part of education is about developing the right attitudes in business.

Example 6: Business management education seems to pay little if any attention to environmental ethics - the needs of the community and the needs of the ecosystem. The problem of industrial waste, and air, water and land pollution is an outcome of lack of education of business about the environment.

Example 7: There are many business executives of large companies and industrial associations do not yet seem to take environmental problems seriously. Sometimes they show complacency, apparently assuming Australia has no significant environmental problems. In *Australia 2010*, the "vision" of the Business Council of Australia, one of the features of today that they want to continue to 2010 is "high environmental standards". Because they assume there are no serious problems now, their list of twelve "desirable outcomes of change" (page 12), fails to mention a healthy environment or industry not damaging the environment. Economically sustainable development is not listed as an objective, and the strategies suggested in the main part of the document seem to totally ignore environmental issues. This seems out of touch with the reality reported by the EPA and assumed in the Discussion Paper. There is an even greater problem among those business executives who publicly denigrate the environmental movement and concern about environmental issues, or who seem reluctant to adopt better environmental practices. For example, Australia has lower targets for motor vehicle emissions than California; this suggests that the Australian car industry is reluctant to adopt "best practice" technology.

Example 8: At the seminar the EPA held with local councils in February to discuss the *Environmental Operations Bill*, several people in local government made the point that it is not enough for council staff to be committed to environmental responsibility - decisions were made by councillors, who on occasion ignored the best advice of staff. It was suggested that local and shire councillors need to be educated.

Example 9: At the same EPA seminar, another block identified was the courts - that while the courts might know the law, they sometimes seemed not to understand the substantive environmental issues involved.

Example 10: Australia has become isolated from other nations in the international discussion on control of greenhouse gas emissions. This is in spite of the material available in government publications about the greenhouse gas problem which shows that some Australian industries and population centres are likely to be harmed by climate change. Australia also has a

particular responsibility to take account of the concerns of the small Pacific Island states whose survival is threatened by the greenhouse effect. It is very clear that some industries, policy advisers and politicians suffer an information deficit on this matter - both about the environmental issues per se, and about the wider industrial implications: the interests of fossil fuel industries are counter to the interests of many other Australian industries.

This means that there is a need for the strategic plan to include consideration of the place of environmental education in a wide range of tertiary education and training courses, such as trade training, engineering and industrial processes, the built environment, business administration, and public/social policy and administration. There is also need for in service training for people already in policy formulation roles within the public sector, and for business executives. A plan which simply uses a wide range of agencies for general community education is not enough. There need to be substantial courses in Sustainable Business Practices.

This is not to suggest that the government has the responsibility to deliver environmental education to every sector. Obviously tertiary educations have to develop their own courses in an appropriate way. Rather it is to suggest that a genuinely strategic plan would take account of these needs and courses; that is, the government has a role in monitoring and assessing what is happening, and, if necessary, in negotiating with appropriate institutions to ensure that the need for environmental education of professionals is adequately fulfilled.

Part 2 Response to questions on comment form

1. Has this discussion paper adequately covered all the important issues relevant to environmental education in NSW?

No. This submission is supportive of the proposal for more a more strategic approach to environmental education, but believes that the Green Paper itself is not sufficiently strategic in its approach.

2. If not, what other issues should be covered in the document as structured?

The paper seems to focus on administrative arrangements rather than educational objectives and outcomes. Most

of part 1 is about how environmental education is delivered, not what objectives the present programs fulfil. The programs listed in section 2 are not assessed against the aims and methods outlined in section 3 or the criteria of "a quality system" listed in section 5.2. This means that although the paper advocates "a new approach" in Part II, it has not adequately evaluated the present approach. The following questions are not addressed: if we are to move to an ecologically sustainable economy, what outcomes do we need from environmental education? To what extent are those outcomes currently being achieved? In other words, the model on page 20 for educational planning has not been followed in this report. We note that on page 15 reference is made to the difficulty of measuring behavioural outcomes, but it would still be possible to look at the content and objectives of current programs and whether there are obvious major gaps in what is being offered.

The focus on administrative arrangements leads to two major problems. It does not provide a realistic model for community education, and it does not explore the crucial area of substantial environmental education for decision-makers.

There is an attempt to define environmental education, pages 17 and 20, but this approach is very generalised and untargeted. A strategic plan for community education needs to provide for mass environmental education which has much more limited objectives, such as the adoption of particular behaviours that are more environmentally responsible, such as composting, recycling, avoiding unnecessary waste, keeping vehicles well maintained, not engaging in activities harmful to bushland or rivers and disposing of toxic household wastes in appropriate manner. Mass community education also needs to provide consumers with the information they need to assess claims that products are "environmentally friendly", to distinguish genuine improvements from meaningless marketing ploys.

The paper acknowledges the need to provide environmental education not only for the general community but also for industry. Many of the points made in the paper refer to industry. Some refer also to policy makers. However, the paper does not seem to differentiate clearly between the different types of environmental education that this involves, ie between the

informal education of the general community about their personal responsibility, and the more formal and rigorous education that significant decision makers in government and industry need if they are to adequately fulfil their professional responsibilities.

The paper refers to the importance of equipping people for the decisions that they make, but does not adequately explore the range of government and business decisions that impact on the environment. This means there is no clarity as to who needs the most substantial forms of environmental education, to what extent that education is currently being provided, what forms such education should take, or who might most appropriately deliver it.

The Green Paper also fails to look seriously at the question of the ethical basis of environmental education. What human values does environmental education depend on and what is the basis of these?

Part I Education for environmental protection in NSW

A strategic approach to environmental education requires that education for different roles and responsibilities be differentiated. Table 1 mentions universities and TAFE under formal providers, Industry training/professional development under non-formal education, and government agencies. However, it is not clear who they target, what specifically they provide, or whether this is sufficient. These areas, which ought to be considered "professional" education, are buried among what are mainly community education initiatives. The reference to unions lumps both general "community" education and industry specific training together.

Similar problems are evident in section 2.4 "Methods of delivery".

Environmental education of secondary school students and the general public also need to be seen as different, since in one case it would include formal requirements and build on other elements in the curriculum, and in the other would be informal, voluntary, and could assume no previous knowledge.

Recommendation 1: *that in the strategic plan, environmental education be differentiated into at least six separate areas: school education, community education, industry-specific training, technical professional education*

(engineers, scientists), professional education for management (including senior management in both public and business sectors) and professional education for policy makers (including those training in economics, law, social policy; how can politicians, especially ministers and councillors, be educated?).

Each of these areas would require further differentiation - the sort of education needed by a senior business executive of a complex business is different from that needed by floor manager in a factory.

Only community education is well covered in this Discussion Paper.

Recommendation 2: *that there be a detailed analysis of environmental education currently available in each of the areas of industry-specific training, professional education for managers, and professional education for policy makers. Who provides the training/education? whom does it target (people in what roles)? what is provided? does it adequately meet the needs of particular roles? What is provided as part of obtaining initial qualifications, and what is provided as continuing education or professional development? is it optional or compulsory?*

There is need to differentiate between education to solve current problems, and education to prevent future problems. The former requires a response to what is already evident. In many cases, it can build on people's horror or inconvenience. The latter requires quite different knowledge, attitudes and skills, such as a willingness to structure environmental concerns into the initial design and planning processes, an ability for forward thinking as to what might happen, and an innovative approach to situations and tasks.

That is, the level of "environmental literacy" and "environmental competence" (page 17) needed by the general population and by people in specific decision making and design roles is quite different.

Recommendation 3: *that the strategic plan differentiate between education to help people deal with present environmental problems, and future-oriented education that helps people avoid future environmental problems through better planning, ensuring new technology is environmentally safe, thinking about the entire life cycle of products and so on.*

This approach would have the advantage of helping differentiate which of the factors in Table 5 are most important in particular situations. For example, while social values and cultural norms play a big part in *personal* environmental responsibility, structural and institutional factors play an important role in *industrial behaviour and professional responsibility*. Environmental responsibility in industry is a part of business ethics. The literature on business ethics shows that employees can only maintain high standards of business ethics when senior management promotes an ethical culture in that business. This is particularly true of environmental responsibility.

Progress towards sustainable development makes good business sense because it can create competitive advantages and new opportunities. But it requires far-reaching shifts in corporate attitudes and new ways of doing business. To move from vision to reality demands strong leadership from the top, sustained commitment throughout the organisation, and an ability to translate challenge into opportunities. Firms must draw up clear plans of action and monitor progress closely.

Sustainability demands that we pay attention to the entire life cycles of our products and to the specific and changing needs of our customers.. (Declaration of the Business Council for Sustainable Development, an international body of business persons. From Stephen Schmidheiny, with the Business Council for Sustainable Development *Changing Course: a global business perspective on development and the environment* Cambridge Massachusetts: MIT Press, 1992, page xii)

This approach obviously requires that environmental education be incorporated into all levels of business education, especially the higher levels of training such as the MBA. There need to be courses on environmentally sustainable business practice; environmental protection needs to become an accepted part of any corporate plan.

There needs to be differentiation between the "tools for environmental protection" (Table 6) which are used by government, and those tools for environmental protection which need to be in the hands of industry. It is environmental education, in

its more sophisticated forms, that puts appropriate tools in the hands of business.

We recognise that it is not the role of government to provide all these forms of environmental education. Rather it is the role of government to monitor environmental education, to evaluate the adequacy of what is provided in terms of what is needed, and, if necessary, to negotiate with the relevant institutions for the provision of appropriate courses.

Parts I and II need to include more explicit evaluation of present programs in environmental education. There are some general evaluative comments, but not a systematic evaluation of the present situation.

Part II The need for a new approach

What Australia needs is an approach which would move environmental education towards the fourth stage set out on page 28:

Pro-active: in which the culture of all organisations is defined in terms of ecologically sustainable living supported by comprehensive, lifelong environmental learning integrated within education systems, industry, social organisations/neighbourhood groups and government.

*To come up with a new, **strategic** approach for environmental education would require differentiating between different types of responsibility and hence the different types of education required.*

For example, if measures to reduce car usage are to work (Example 1 page 22), *who* needs to support them and *what* form of support is necessary? Who are the key players? Training the motor vehicle repair industry to meet the new standards is a very specific task, an upgrading of particular knowledge and skills in one particular industry. "Promoting awareness among planners, policymakers and key decision makers which impinge on air quality and strategies for clean air" is a very diffuse and general task which needs to be broken down into a number of specifics - where are these people found, how does one reach them with educational programs, and what programs are necessary? Presumably this latter task includes state and local politicians, state and local council bureaucrats in both planning and policy, land developers, and planning and environmental courts. People in different

roles would need different types of knowledge.

Example 2, page 23, also differentiates a number of community strategies, but does not adequately differentiate strategies directed at industry and government.

In Section 4.2, a number of important frameworks are listed, such as Agenda 21 and the National Ecologically Sustainable Development Strategy. These are important, and more attention needs to be paid to their precise implications for environmental education. What is required in environmental education, for example, if the *Compendium of National Ecologically Sustainable Development Strategy Recommendations* December 1992, is to be effectively implemented? Or who needs to know what, if the legislation listed in this section of the discussion paper is to be effectively implemented?

There is some move in this direction in both sections 4.2 and 4.3 but it needs to be much clearer. For example, under "National Economic Reform Strategy", it is mentioned that competition policy is sometimes used to weaken environmental protection. This is surely a problem requiring education not of everyone in general, but of economists and business executives in particular.

This would suggest that *section 5 needs to be expanded, to articulate much more clearly the need for different educational strategies for different sectors and purposes.* The characteristics of a quality system in 5.2 need to be expanded and differentiated, to articulate the qualities which should characterise each major type of environmental education. At present, the characteristics are those of a community education system, rather than articulating the different characteristics appropriate to schools, or to provide industry specific skills, or to provide adequate professional education for technologists, managers or policy makers. *At least three types of characteristics need to be differentiated: administrative requirements, process requirements (how the education is done, eg the list at the bottom of page 20), and intended outcomes.* "Mass" outcomes (eg residents utilising recycling opportunities provided by councils) need to be differentiated from outcomes where a more limited effect may be adequate, such as active involvement in environmental protection activities. Any list of characteristics also needs to indicate which

characteristics are essential if other desirable characteristics are to be possible. In other words, *means and ends need to be more clearly differentiated and identified.*

Part III The way forward

Some of the comments made on section 5 also apply to section 6.

Section 6.1 needs to be made more specific. At present it is very general and vague, with occasional references to the various stakeholders but an overall approach which seems to be about community education. *It needs to make clear what is really envisaged (which at present is hidden by the jargon) and how the steps set out in this section will fulfil the stated vision, namely*

A high quality, integrated and effective system which ensures that all stakeholders have a role in planning, delivering and evaluating strategic environmental education for ecologically sustainable development in NSW.

The section provides a number of administrative criteria that the educational policy has to meet as part of overall government policy, in general terms such as cost, evaluation, involving certain educators, and so on, but offers no actual educational or environmental objectives. That is, it is about external policy constraints, rather than about the content of the policy itself.

Similar comments could be made about section 6.2. There is *need for mention of key educational issues* such as: if NSW is to effectively implement the various components of the ESD strategy, who needs to know what, and who can best provide that education, when, where and in what form? In each case, what educational processes enable people to develop the specific expertise that they require? What sort of resources are required for each type of education? Is it already available or not? What sort of cooperation is required between agencies such as the EPA, and educational institutions such as TAFE, the universities and organisations providing continuing professional education? And so on.

For example, informal education of people in the community to encourage them to compost, recycle and to dispose of household toxic residues in an appropriate manner is quite different from what is required to ensure that an engineer, in

designing a new chemical plant, has the awareness, commitment and skills to minimise the toxic waste produced, and to find responsible ways of disposing of the amount of industrial waste produced. Both these forms of education will be different from that required to produce senior business executives who understand the need to develop and use new processes that minimise waste production, even if this is more expensive than current alternatives, or the need to include environmental protection in their corporate plan. Both the engineer and the business executive will need some knowledge of the legal requirements that they must meet, but will need less training than the judges of the land and environment court to which they may take their case if their proposals for development are deemed unsatisfactory.

Section 7 thus seems to rely on an unrealistic "grand plan". It is hard to see how such a diverse group as the Environmental Education Council can develop a genuinely strategic plan, or oversee the sector specific high quality environmental education that is needed, since the council is expected to cover, apparently, everything from primary education to informal community education to industry specific training for workers to rigorous, highly technical courses for engineers, scientists, lawyers, policy makers and business executives. It seems to bring together people who may have a high level of expertise in their own area, but who will be required for much of their time to deal with educational areas where the educational issues are very different and where they have no specific expertise whatever.

At the very least, the proposed Council for Environmental Education

will need access to a much *better survey of current environment education* than is provided in the Discussion Paper, especially with regard to technical and tertiary education ;

will need to *establish a number of specific task groups*, to look at specific types of education such as: general community education, school education, industry specific education, professional technical education (engineers, scientists etc), professional business education (managers, senior business executives), and professional education of policy

makers (politicians, bureaucrats and lawyers).

The makeup proposed for the Council for Environmental Education needs to be reconsidered to ensure that it has the appropriate expertise and networks to cover these different types of environmental education.

- will need *adequate funding* for staff
- will need *an adequate research base*.
- will need *at least one member who has expertise in the ethics and human values. The NSW Ecumenical Council might be approached to nominate someone.*

The strategic plan that is required would need to be based on careful research. Some of this is covered by the educational planning model on Page 20. However, *in preparing a strategic plan there would also be need to consider the following questions:*

For each of the designated areas of environmental education, what is being done, by whom, and where, at the present time?

How effective is that education? is it making a difference?

What is best practice in different types of environmental education? That is, what models of environmental education actually enable people to fulfil their roles and responsibilities in accordance with ESD principles? What are the educational objectives, process, and content?

What human values and ethical principles does environmental education depend on? What is there basis in a pluralist society?

What are the gaps in environmental education in each of the designated areas, and what how can those gaps be effectively filled?

What sort of educational processes are required to enable people to move from a general commitment to ecologically sustainable development to the effective implementation of such principles in areas such as the integrated planning of new development areas?

What are the future challenges for which environmental education needs to equip people? What problems may develop and what forms of environmental education might equip people to avoid those

problems? How can education equip people to consider the future as well as the present and the past?

Should all tertiary education include some form of environmental education, and if so, is there some common core which all students need, or should it be course specific?

(This submission was prepared on behalf of the Board for Social Responsibility by Rev. Ann Wansbrough).

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