NGO Assessment of the Australian Government's State Party Report on the state of conservation for Australia's Great Barrier Reef

Report to UNESCO World Heritage Centre – 1 February 2026

Australian Marine Conservation Society & WWF-Australia

First Nations peoples are the Traditional Owners and the first managers of the Great Barrier Reef and we respect their ongoing cultural authority in managing their Sea Country for current and future generations.

1.Introduction

The Australian Marine Conservation Society (AMCS) and WWF-Australia (hereafter WWF) provide this independent critique of the Australian government's State Party report on the state of conservation of the Great Barrier Reef.

The 47th session of the World Heritage Committee (WHC) adopted decision **7B.2 Great Barrier Reef**, which requested Australia to report on progress made in delivering ambitious actions on water quality, fisheries management, alignment with a 1.5°C pathway and actions to limit the impact of climate change on the property. The Committee also requested a report on the full impacts of the 2023/24 bleaching event.

In our critique, we examine progress against the recommendations of the joint UNESCO-IUCN Reactive Monitoring Mission report; the commitments made by the former Australian Minister for Environment, the Hon. Tanya Plibersek to the UNESCO Director-General in a letter dated May 2023; and the requests made to the State Party in the decision of the 47th session of the World Heritage Committee.

We include policy recommendations regarding boosting the Reef's resilience to climate change, improving water quality and sustainable fisheries. Our report follows the order of the Australian government's SoC report.

A summary of key points follows:

Boosting the Reef's resilience to climate change

While the Australian government has made some progress on domestic climate policies and actions, Australia remains a significant exporter of fossil fuels, and one of four Global North countries driving fossil fuel expansion since the Paris Agreement. Australia's domestic targets for 2030 and 2035 fall significantly short of what the science indicates is necessary to be considered 1.5°C-aligned and are

more aligned with a 2°C+ warming scenario. At a state level, a series of significant backwards steps in the past 18 months have raised serious questions about whether the Queensland government is committed to any emissions reduction trajectory.

Improving water quality on the Great Barrier Reef

The 2025 water quality targets have not been met. The World Heritage Committee's request to complete the updated Water Quality Improvement Plan (WQIP) by 2025 has also not been met. A new Catchment Water Quality strategy through to 2030 is still under development. Australia's investment in Reef water quality is vital but still lags significantly short of what is needed to meet the water quality targets by 2030. The 2022 Scientific Consensus Statement concluded that it is essential to achieve the targets within the decade to enhance the resilience of the inshore ecosystems of the World Heritage property. We welcome the Australian government's new native vegetation regulations in the Reef catchment.

Sustainable Fisheries

In the last 12 months there has been little progress by the Queensland government in fully delivering the Sustainable Fisheries Strategy. While the Strategy has not been formally abandoned, a five-year Fisheries and Seafood Action Plan is currently in development and is likely to replace the Strategy. Many of the 2027 targets of the Strategy are unlikely to be achieved, in particular, building all fish stocks to 60% of unfished biomass, which has already been abandoned for Spanish mackerel, an iconic species in Queensland.

The phase out of large mesh gillnet fishing from the Great Barrier Reef by June 2027 appears to be largely on track, however, the timeline for trawl vessels to have electronic monitoring has been pushed back to June 2032 and will not cover 100% of trawl effort. Given the very poor outlook for the Great Barrier Reef and the increasing frequency and severity of climate-induced disturbance events, in particular mass coral bleaching, we consider a wild harvest coral fishery to be incompatible with the conservation goals of a World Heritage property.

For convenience, we attach two Appendices which have previously been supplied to UNESCO and IUCN:

- An Emergency Response Plan prepared by AMCS and WWF that outlines priority actions to relieve pressure on the Reef during and immediately after extreme weather events.
- World Heritage Briefing: Queensland Coral Fishery

Since the 47th session, IUCN released its 4th World Heritage Outlook Report, which found that the outlook for the Great Barrier Reef is "critical". This outlook has not changed since the third report. Indeed, since the third report was released in December 2020, the Reef has experienced three further mass coral bleaching events (2022, 2024 and 2025). In a rapid space of time, these events have become biennial.

If this iconic World Heritage property is to have a future, the Australian and Queensland governments must strengthen and accelerate existing efforts to protect the property and introduce new conservation measures. We are concerned that the Queensland government is backsliding on commitments, particularly on the climate front. We need the Australian government to be bolder.

As always, we are deeply grateful for the ongoing work by UNESCO's World Heritage Centre and IUCN to frame draft decisions for the World Heritage Committee that express deep or utmost concerns, welcome positive steps, and request the State Party to urgently commit to stronger action to conserve, protect and transmit to future generations our priceless Great Barrier Reef.

Recommendations

The Australian and Queensland governments should recognise Traditional Owners as Custodians of the Great Barrier Reef with inherent rights, interests, obligations and aspirations in the management of the Great Barrier Reef, and ensure they have greater participation and leadership in management, policy, and decision-making in the below recommended actions.

Chapter 2.1 Boosting the Reef's Resilience to Climate Change

1. The Australian government should report back to the World Heritage Committee in 2028 on aligning Australia's emissions reduction targets and NDCs with a 1.5°C pathway. That requires they commit Australia to emissions reduction targets of 90% below 2005 levels by 2035 and net zero before 2040.
2. The Queensland government should report back to the World Heritage Committee in 2028 to explain what concrete policies it has put in place to reach the 75% below 2005 by 2035 emissions reduction targets.
3. The Queensland government must urgently commit to an ambitious and credible energy plan that will ensure Queensland meets its climate targets set out in the *Clean Economy Jobs Act 2024* and provides opportunities for ratcheting up those climate targets to reach net zero before 2040.
4. The Australian government should urgently replace Australia's fossil fuel exports with new clean export industries. To do so, and to be aligned with what climate science shows is necessary for stabilising warming at 1.5°C, Australia should end the approval of new coal, oil and gas export projects, and map out a comprehensive national plan – with timelines - for the phase out of existing fossil fuel exports and their replacement with renewable exports.
5. Urgently implement strengthened protection of high value refugia and connectivity reefs.
6. Integrate catchment and in-water initiatives by scaling up landscape repair, coastal ecosystem protection and pollution reduction aligned with greater in-water protections.
7. The Australian and Queensland governments should urgently implement an Emergency Response Plan to severe coral bleaching and other extreme weather events and report back to the World Heritage Committee in 2026 on progress.

Chapter 2.2 Improving water quality on the Great Barrier Reef

8. To sustain the Outstanding Universal Value of the Reef and meet the water quality targets, a substantial increase in investment and an ongoing strategic and coordinated investment approach is required, focusing on the most cost-effective management interventions, targeting areas that contribute the highest pollution loads, and tailored to catchment-specific circumstances.
9. Establish a single publicly accessible database reporting at least annually on pollution reductions achieved from all government-funded projects.
10. The Australian and Queensland governments must finalise a technically-sound, ambitious catchment water quality strategy no later than March 2026, with updated water quality targets. The final strategy must include:
    a. A primary focus on delivering the water quality targets by 2030 and include the repair and restoration of coastal wetlands and riparian ecosystems as a major new initiative.

    b. Land management and catchment-specific targets that align with the 2030 timeframe for achieving the water quality targets. Catchment specific targets should include a real gain in riparian and wetlands extent and condition.
    c. A long-term investment roadmap including an updated cost estimate of meeting revised water quality and land and catchment targets by 2030.
11. Increase investments to deliver long-term and large-scale wetland rehabilitation projects in DIN pollution hotspots.
12. Ensure Queensland government funded rehabilitation and restoration programs align with the Reef 2050 Wetlands Strategy and target pollution hotspots in coordination with the Reefwise Wetlands Program.
13. The Australian government must, as a matter of urgency, ensure that landholders in the GBR catchment are fully aware of the new native vegetation clauses in existing federal legislation; ensure real time monitoring of native vegetation extent in the catchment; and undertake enforcement action if any illegal clearing.
14. The Queensland government should as a matter of urgency amend the *Vegetation Management Act 1999* to align with the EPBC Act vegetation reforms.
15. Ensure full compliance with Queensland's Reef Protection Regulations by:
    a. substantially increasing compliance activity and enforcement from what is currently achieved;
    b. providing publicly available transparent reporting on compliance activity and landholder compliance on the Reef Compliance Dashboard at least yearly.
16. Develop regulated minimum practice standards under the Reef Protection Regulations for emerging crops, grains, horticulture, macadamias and other agricultural commodities that are produced in catchments that discharge to the Great Barrier Reef.
17. Ensure that all voluntary Best Management Practice industry programs effectively deliver water quality improvements, meet and exceed regulated minimum practice standards, are government-accredited, and publicly report water pollution load reductions annually.

Chapter 2. Sustainable Fisheries

18. The Queensland Government expands Net-Free Zones to incorporate biologically important areas for threatened and endangered species, with a particular focus on species that represent attributes of OUV.
19. The Australian and Queensland Governments complete the phase out of gillnet fishing by June 2027.
20. The Queensland Government prioritises the implementation of electronic monitoring on all active trawl vessels by December 2028.
21. The Queensland Government ensures that a statistically robust proportion of electronic monitoring footage required to accurately identify interactions with threatened species is reviewed. A minimum of 20% of electronic monitoring footage is cross checked with fisher logbook reporting.
22. The Queensland Government publishes summary data from electronic monitoring systems on threatened species interactions and their fate (alive, injured, dead) each quarter, no more than three months in arrears. Discrepancies between logbook data and independent monitoring should also be made publicly available annually.
23. The Queensland Government revise the East Coast Inshore, Trawl and Coral fishery harvest strategies to ensure they reflect current target species and include decision rules that meet the targets of the Sustainable Fisheries Strategy 2017-2027.
24. The Queensland Government ensure that all fish stocks are managed to a Maximum Economic Yield of at least 60% of unfished biomass.

25. The Australian and Queensland Governments support the Queensland Coral Fishery to transition from wild harvest within the property to aquaculture production by December 2028.
26. The Queensland Government mandates the use of Effective BRDs within the trawl fishery by June 2027 to reduce the capture of TEPS.

2. Response to 2025 Decision of the World Heritage Committee WHC 47COM 7B.2

This critique will assess Australia's response not only to the decision adopted at WHC 47COM, but also to the recommendations of the 2022 Joint UNESCO-IUCN Reactive Monitoring Mission (RMM) report and to the commitments made by the former Australian Minister for Environment, the Hon. Tanya Plibersek to the UNESCO Director-General in a letter dated May 2023.

2.1 Boosting the Reef's resilience to climate change

Introduction

The Australian and Queensland governments are not currently implementing the World Heritage Committee's recommendation to develop 1.5°C-aligned policies to protect and conserve the Outstanding Universal Value (OUV) of the Great Barrier Reef. Opportunities exist to address this misalignment through strengthening targets and existing policies, adding new initiatives, unwinding recent backwards steps and delivering on a plan for phasing out fossil fuel emissions domestically and from Australia's exports.

While there are a number of existing programs to reduce pressure on the Reef (such as the Crown-of-Thorns Starfish Control Program) and a major new program to assist heat tolerant corals to adapt to climate change (the Reef Restoration and Adaptation Program), a vital tool in the future management of the Great Barrier Reef will be a more sophisticated and accurate understanding of which Reef areas act as critical sources of resilience and recovery in the face of increasingly severe and frequent climate-induced events.

We have been encouraged that GBRMPA is working with experts to map these reefs that are critical to protect for the Reef's future. However, this preliminary work needs to be translated into urgent in-water action to ensure that the resilience of the World Heritage property is substantially strengthened. In-water action also needs to be coordinated with scaled up catchment protection to ensure that protection actions at sea and on land keep pace with the rate of climate-induced change.

2.1.1 Australia's climate change and emission reduction policies

2022 Reactive Monitoring Report recommendation(s) [1]	**Recommendation P6:** Review and strengthen, by 31 December 2022, the Reef 2050 Plan to include clear government commitments to reduce greenhouse emissions consistent with the efforts required to limit the global average temperature increase to 1.5°C above preindustrial levels. In particular, develop and implement ambitious emissions reductions activities consistent with limiting the global average temperature increase to 1.5°C above pre-industrial levels. **Recommendation O6:** At the State level (Queensland government), ensure the 1.5°C target is supported by legislation, and clear, actionable steps to achieve this target are set within the state's existing climate related strategies and plans; with associated opportunities optimized to become a 'climate action hub' for the GBR.
May 2023 Letter from Australian Environment Minister to UNESCO[2]: commitments made	Please refer to pages 2 and 3 of the letter, commitments 1 and 2 in the section on Climate Change.

2025 WHC 47 COM adopted decision[3]	7. Reiterates its request to the State Party to ensure the Reef 2050 Plan is effectively implemented to limit the impacts of climate change on the property, and to set further ambitious targets to limit temperature increases consistent with limiting global temperature to 1.5°C above pre-industrial levels, and align its policies accordingly, and also encourages the State Party to establish effective mechanisms to mitigate negative impacts of extreme weather events to the OUV of the property;

Emissions reduction targets

Australian government

Climate change is the greatest threat to the Reef's survival, which means that the single most impactful thing that could be done to build the Reef's resilience is to significantly reduce the emissions that will continue to see global heating intensify to unmanageable levels. In September 2025, the Australian government announced its Nationally Determined Contribution (NDC) of 62-70% emissions reductions by 2035, compared to a 2005 baseline.[4] The *State Party Report on the state of conservation for Australia's Great Barrier Reef* (SoC)[5] asserts that "this will make a credible contribution to global efforts to hold temperature increases to well below 2°C and to pursue efforts to limit it to 1.5°C". This is a significantly lower standard than being 1.5°C-aligned, as required by paragraph 7 of Decision 47 COM 7B.2.

We acknowledge the advice by the Climate Change Authority (CCA),[6] which recommended the 62-70% range. The CCA is required by legislation to consider a range of matters in providing their advice on targets, but despite Australia's obligations as a party to the Paris Agreement, it is not required to recommend targets that are specifically 1.5°C-aligned.[7] Significantly, Australia's Climate Change Authority (CCA) and the Federal Government's *Net Zero Plan*[8] both acknowledge that the targets in themselves are not 1.5°C-aligned.

A range of independent expert scientific analyses indicate that Australia's existing 2030 target and its new 2035 NDC range are not aligned with a 1.5°C outcome (see Table 1). For example, Climate Analytics notes that Australia's projected emissions through to 2040 are "far above" a 1.5°C-aligned range.[9] They also note that overshoot "on a sustained basis would significantly increase the likelihood of severe, widespread, and irreversible impacts, globally and in Australia."[10] It is important to note that though the latest climate science shows a period of overshoot of 1.5°C is inevitable, even if the 1.5°C threshold is temporarily exceeded, the target remains both legally and scientifically relevant.[11]

Table 1. Comparative analyses of Australia's 2030 and 2035 targets Recommended targets

Comparative analyses of Australia's 2030 and 2035 targets Recommended targets	**2030**	**2035**	**Notes**
Australian government's committed NDCs	43%	62-70%	
Climate Analytics[12]	72%	81%	1.5°C-aligned, limited overshoot
Climate Resource[13]	67%	(Net zero by 2038)	1.5°C-aligned, limited overshoot
Australian Academy of Sciences[14]	74%	Net zero	

The conclusion from all these independent expert analyses is that Australia would need to significantly overachieve the 70% end of the NDC range to get close to being aligned to a 1.5°C outcome and to meeting Australia's legal obligations under the World Heritage Convention to protect the OUV of the Great Barrier Reef.

The CCA's 2024 Issues Paper that preceded the final 2035 NDC decision identified that an ambitious target should be "aligned with 1.5°C" and "science-aligned".[15] Instead, the final NDC decision shifted this principle to claim that the combination of the 2035 target and our "international/offshore contributions" through our potential green exports (e.g. green metals, green hydrogen) could together *add up* to a contribution that is 1.5°C-aligned.[16] What this fails to acknowledge is that Australia is one of the world's largest producers and exporters of fossil fuels and continues to expand fossil fuel production alongside these emerging green exports. This is discussed in part 4 of this section.

In short, the Australian government's current targets fall significantly short of what the science indicates is necessary to be considered 1.5°C-aligned and are aligned with a 2°C+ warming scenario.

Recommendation:

1. The Australian government should report back to the World Heritage Committee in 2028 on aligning Australia's emissions reduction targets and NDCs with a 1.5°C pathway. That requires they commit Australia to emissions reduction targets of 90% below 2005 levels by 2035 and net zero before 2040.

Queensland government

The SoC states that "the Queensland government remains committed to achieving net zero emissions by 2050 and providing a credible pathway to this target". However, we note with considerable concern that the SoC makes no mention of the Queensland government's 2035 emissions target of 75% reduction. While the 2035 target remains in legislation, the Queensland Government has stopped referring to the 2035 target publicly and has given numerous indications, particularly with the release of the Queensland Energy Roadmap discussed below, that it is no longer a firm policy commitment. Most concerning of these, is the recent decision to delay the publication of emissions reduction sector plans by five years, from 2025 to 2030. This is discussed further in section 2.2 below.

A series of significant backwards steps in the past 18 months have raised are serious questions about whether the Queensland government is committed to its existing 2035 target, to net zero by 2050 or to any emissions reduction trajectory or carbon budget consistent with the Paris Agreement and to the protection of the OUV of the Great Barrier Reef.

Recommendation:

2. The Queensland government should report back to the World Heritage Committee in 2028 to explain what concrete policies it has put in place to reach the 75% below 2005 by 2035 emissions reduction targets.

Transitioning to a Net Zero Future

Australian government

There is no doubt that Australia's domestic climate policy landscape has improved significantly in the past few years, however, we also note that Australia has shipped more coal overseas during the last quarter of 2025 than any other quarter in history.[17]

While we want to see more ambition, we commend the Albanese Government for progress on domestic emissions policy. In particular, we acknowledge the $22.7 billion *Future Made in Australia* package as a major commitment to driving decarbonisation (including globally through clean exports) across a range of industries. Similarly, the Australian government's policy support for electricity sector decarbonisation is welcome, with over 50% of the national energy system being supplied by renewables and storage in the last quarter of 2025[18].

Despite this progress, Australia is not doing enough to reduce emissions in line with a 1.5°C scientific standard and the pace of decarbonisation remains well off track. Climate policy remains fragmented and under-resourced and often contradicted by other policy measures taken by the Australian government to support and expand fossil fuels. Analysis by the Climateworks Centre found that economically viable and fiscally responsible policy pathways exist to reach 85% emissions reduction in Australia by 2035.[19]

The Australian Government's current signature climate policy, the Safeguard Mechanism, is not adequate to drive the emissions reductions needed across the economy. Climate Analytics says that the Safeguard Mechanism provides "inadequate incentives for production-centric emissions reductions", that its "effectiveness in driving gross emissions reductions is uncertain", and "there is a high risk that gross emissions reductions remain misaligned with what is needed for 1.5°C alignment".[20]

The rate of emissions decline required by the Safeguard Mechanism will be considered in a review of the program scheduled for 2026-27. This is the opportunity to further improve this core piece of climate policy, including expanding its coverage beyond the current 200 largest industrial emitters by lowering the threshold from 100,000 tonnes to 25,000 tonnes.

Australia lags behind many other countries when it comes to transport emissions, which contribute 22% of Australia's annual total domestic emissions.[21] A recent report by the OECD noted that Australia's new vehicle fuel efficiency standards are "less demanding than those in Europe and some other OECD countries" and that electric vehicle sales are low relative to peer economies.[22] In addition, Australia's current tax system perversely provides economic incentives for the uptake of larger passenger vehicles[23] and the continued, high-volume use of diesel in the heavy freight industry by significantly reducing the net cost of fuel, which makes alternative, lower-emission fuels less competitive.

Australia continues to provide approximately $15 billion per year in subsidies to producers and major users of fossil fuels.[24] The largest component of this is the $10.2 billion spent in 2024-25 on the Fuel Tax Credit Scheme, a discount that creates a disincentive to fuel efficiency or fuel switching. In addition, Australia has no national policy framework aimed at restricting fossil fuel exploration, production and infrastructure, or to phase out fossil fuels domestically and for export (discussed further below).[25]

Queensland government

In recent years, Queensland has been leading the country in clean energy development.[26] However, the current Queensland government is undermining this leadership by prioritising coal and gas, eliminating legislated renewable energy targets, and increasing regulatory hurdles for new wind and solar projects.[27] This not only rolls back climate action from Queensland, but also significantly reduces Queensland's economic opportunities and job creation By undermining a target-based renewable roll-out, Queensland risks missing out on long-term benefits for regional communities and being less competitive for investment. Analysis by Jacobs for the Clean Energy Council found that delaying the shift to renewable energy could cost household electricity consumers between $568 to $729 more per year.[28] A 2022 analysis from Accenture found that Queensland can at least halve its domestic carbon emissions this decade and create 87,000 new jobs across new industries

by harnessing its abundant renewable energy and natural environment. Two of the three key actions needed to achieve that significant jobs benefit are re-powering Queensland with clean energy by decarbonising the electricity sector and accelerating the development of a clean export industry.[29]

Queensland is also particularly vulnerable economically to a decline in global demand for coal and gas,[30] which is a central pillar of the International Energy Agency's Net Zero by 2050 scenario, with unabated coal generation ending globally by 2040.[31] Seizing the full opportunity presented by renewable energy and getting ahead of global competition for green trade is in Queensland's best economic interests.

Instead of seizing these evidence-based opportunities for economic development and a just transition, the *Queensland Energy Roadmap*[32] committed to extending the life of coal power stations beyond previously committed closure dates. It is backed by a $1.6 billion Electricity Maintenance Guarantee fund to maintain these coal assets (and existing hydroelectricity and gas generators) into the future. Some coal generators are now slated to be kept open until 2046 and possibly beyond.[33] There is no carbon budget scenario or emissions reduction trajectory in which this is compatible with achieving a 1.5°C outcome. The previous Queensland government had developed a very credible, widely respected and ambitious energy plan for the state. The dramatic dismantling of this framework by the current government completely undermines its credibility on the urgent energy transition needed to protect the OUV of the Great Barrier Reef.[34]

A key upcoming test of the Queensland government's credibility on emissions generally was going to be the sector emissions reduction plans which are required to be published no later than 31 December 2025 under the *Clean Economy Jobs Act*.[35] The Queensland government has now delayed the programming for these sector plans by five years - a decision that will significantly undermine the ability of Queensland to achieve the 75% by 2035 emissions reduction target.[36] The Queensland Conservation Council has released analysis which estimates that under the gnu energy road map, the state will only reach about 50% emissions reductions by 2035.[37] Leading Australian climate and energy experts at The Grattan Institute say the sector planned delay means emissions reductions by 2035 may be even lower than the Queensland Conservation Council estimate.[38]

Further to the above, as a result of the handbrake applied to the energy transition, other sectors such as transport, agriculture, industry and the built environment will need to achieve a possibly unachievable level of emissions reductions to keep the state on track to meet its 2035 emissions target.

These policy rollbacks don't only put the Queensland economy and new jobs in clean industries at risk. The climate implications mean they also put Reef jobs at risk. A 2025 analysis from Deloitte Access Economics has found that today the Great Barrier Reef supports 77 000 jobs and contributes AU$9 billion to the Australian economy.[39] This makes the Reef equivalent to Australia's fifth largest employer. Sixty-one thousand of those jobs and AU$6.9 billion of that economic contribution is realised within Queensland. Fifty-six thousand of those jobs and AU$6.1 billion of that economic contribution is realised within Great Barrier Reef regions.[40]

The Queensland Government needs to commit to an Energy Plan that makes the most of the state's renewable resources and ensures a fast, fair and just transition that is aligned with doing Queensland's part in stabilising global average temperatures to 1.5°C above pre-industrial levels.

Renewable energy

Australian government

The SoC states that the Australian government is continuing to deliver key policies that put Australia on track to transform the electricity grid to 82% renewable electricity by 2030.

The Australian government has scaled up the Capacity Investment Scheme[41] to deliver 40 GW of generation (26 GW) and dispatchable/storage (14 GW) capacity by 2030, but barriers still exist that could prevent that capacity from being approved and connected to the grid in a timely manner.

Recent analysis by Bloomberg New Energy Finance concluded that "more needs to be done, and faster, for Australia to achieve its target for 82% renewable energy penetration by 2030".[42] In particular, the rollout of large scale renewable energy is hampered by delays in build out of transmission infrastructure, inefficient planning and environmental approvals, and challenges relating to community support and social licence.

Queensland government

As outlined above, the Queensland government's new Energy Roadmap is a major backward step for renewable energy in the state. The achievements listed in the SoC are due to the policy and investment conditions created by the previous government, and the claim by the current government that they remain committed to net zero does not match their actions to date. The SoC points to the creation of "regional energy hubs" as a noteworthy step, but in practice the main difference between these and the renewable energy zones they replace is that the renamed "regional energy hubs" will host new gas generation capacity and therefore cannot be called "renewable".

Beyond changes to legislation and policy, the current Queensland government has adopted a practice of "calling in" renewable energy projects, including those that they had previously been approved. This means the Minister is often taking over the statutory decision-making process. This has created a "policy environment that has become volatile and chaotic" for renewable energy investment, according to the Clean Energy Council (the main peak body for the renewable energy industry).[43] None of the Queensland government's actions in the last 12 months indicate a genuine commitment to a rapid transition to renewable energy.

Recommendation:

3. The Queensland government must urgently commit to an ambitious and credible energy plan that will ensure Queensland meets its climate targets set out in the *Clean Economy Jobs Act 2024* and provides opportunities for ratcheting up those climate targets to reach net zero before 2040.

Australia's fossil fuel exports are harming the OUV of the Great Barrier Reef

Australia remains a significant exporter of fossil fuels, and is one of four Global North countries driving fossil fuel expansion since the Paris Agreement.[44] There is incontrovertible evidence that Australia's fossil fuel exports are causing ongoing and foreseeable climate damage to coral reefs and communities that rely on them both in Australia and globally[45] with specific and measurable impacts to the Great Barrier Reef.

At the same time, the Australian government claims to take a leadership position in the region and globally on climate action, coral reef resilience and ocean protection. This inconsistent and self-defeating stance should be of significant concern to UNESCO, IUCN and the World Heritage committee given Australia's responsibility to care for the Great Barrier Reef.

As noted above, both the Australian government's *Net Zero Plan* and the Climate Change Authority's targets advice concede that Australia's targets alone are not consistent with a 1.5°C outcome. Rather, they claim Australia's holistic package of targets plus our exports of clean energy demonstrate our overall contribution to global efforts.

This ignores Australia's significant negative contribution to global decarbonization efforts through the ongoing exports of fossil fuels.[46] Australia's fossil fuel exports have not only caused measurable harm to the Great Barrier Reef and coral reefs worldwide, they have also had a multiplying effect as they discourage other countries from accelerating the clean energy transition.

While Australia's fossil fuel exports are already very high the government is approving new and expanded extraction projects.[47] A recent report from the International Energy Agency shows that 58% of the capacity of proposed coal mines globally (known to the IEA) is in Australia.[48] Roughly 50% of the proposed capacity in Australia is thermal coal - between 50 and 70 million tonnes per year.

Many of these projects are in Queensland: 35 of 46 proposed coal projects on an Australian government major projects list are in Queensland.[49] Further the Queensland government has approved exploration for oil and gas in a new basin, in an area that fossil fuel expansion advocates note could become Australia's first major new oil province since the 1970s.[50]

Analysis by Climate Analytics concludes that "the emissions that would arise from the government's projected fossil fuel exports in terms of both domestic production and end-use emissions, clearly not consistent with a global 1.5°C trajectory".[51] Australia accounts for less than 0.4% of the world's population yet it is responsible for around 4.5% of global fossil carbon dioxide emissions, with 80% of those emissions coming from its fossil fuel exports. Climate Analytics also found that under current government policies this is set to increase by 50% over the next decade to 2035.[52] Neither the Australian nor the Queensland government is taking appropriate steps to reduce their contribution to global emissions from exported fossil fuels.

This is a major problem that needs to be urgently addressed for Australia to meet its obligations under the World Heritage convention to protect the OUV of the Great Barrier Reef from ongoing climate damage. Having pledged to join the Belem Declaration on the Transition Away from Fossil Fuels and now holding the presidency over UNFCCC COP 31 negotiations, the Australian government now needs to phase out Australia's fossil fuel exports in order to be well positioned to drive international efforts to do so.

Recommendation:

4. The Australian government should urgently replace Australia's fossil fuel exports with new clean export industries. To do so and to be aligned with what climate science shows is necessary for stabilising warming at 1.5°C, Australia should end the approval of new coal, oil and gas export projects, and map out a comprehensive national plan – with timelines - for the phase out of existing fossil fuel exports and their replacement with renewable exports.

2.1.2 Direct Action to Reduce Pressures

Crown-of-Thorns (COTS) Control Program

2022 Reactive Monitoring Report recommendation(s)	**Recommendation O5:** Optimize the opportunity presented by the revision and update of the GBRMPA Blueprint for Resilience (that is scheduled for 2022) to more clearly demonstrate the actions that will be undertaken within the GBR to increase awareness of climate mitigation needs and present clear and actionable activities to reduce climate impacts on the OUV of the property.

May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	
2025 WHC 47 COM adopted decision	"2. Recalling Decisions **45 COM 7B.13** and **46 COM 7B.62 …"** **[46 COM 7B.62:** 9. Requests the State Party to maintain adaptation programmes, including the 'Crown-of-Thorns Starfish Control Program' and the 'Reef Joint Field Management Program', and increase funding for innovation and scaling up of priority solutions;]

At the Great Barrier Reef Resilience Forum convened by GBRMPA in October 2025 the Crown-of-Thorns Starfish (COTS) Control Program was a focus of considerable attention and support as a practical and direct action to safeguard and restore coral habitat.

The COTS program should continue to evolve to be more proactively targeted to maximise its impact in protecting these reefs. It should increasingly focus on anticipating and preventing COTS outbreaks, rather than reacting to outbreaks after they have occurred.

We continue to support ongoing investment in the COTS Control Program as it makes an important measurable impact on reducing COTS infestations on priority coral reefs.

2.1.3 Supporting adaptation to climate change

Reef Restoration and Adaptation Program (RRAP)

2022 Reactive Monitoring Report recommendation(s)	**Recommendation P8:** Continue support for scientific research and increase financial resources to enable deployment of climate adaptation mechanisms developed through this research at the required scale to be effective in mitigating and adapting to climate change impacts across the property, including initiatives undertaken by AIMS (SeaSim and associated research activities), as well as wider restoration initiatives that directly support the rehabilitation of habitat and concurrent carbon sequestration.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	
2025 WHC 47 COM adopted decision	"2. Recalling Decisions **45 COM 7B.13** and **46 COM 7B.62** …" **[45 COM 7B.13** 4. Notes with appreciation the State Party's initial commencement of the implementation of the 2022 Reactive Monitoring mission recommendations, and requests the State Party to extend these efforts to fully implement all the recommendations of the mission]

The Reef Restoration and Adaptation Program (RRAP) is an important, multi-institutional response to understanding and responding to the impacts of climate change on the GBR. It has meant a significant financial and institutional investment that now provides prioritised investment in ongoing research and deployment.

RRAP's in-water successes to date are important, though it is still very early days to show that successful settlement and 1-2 year grow out will be sustained over the coming decades of increasing sea surface temperatures and intensifying weather events.

RRAP should be commended for its engagement and involvement with Traditional Owner communities and establishing a multi-sectoral stakeholder advisory committee to provide advice on engagement with local communities and deployment in partnership with relevant local commercial enterprises.

RRAP's initial five-year operational phase ceases in mid-2026. In the next phase of the project, its modelling and decision support platforms should be used to inform the Reef Authority's resilience management approach as well as any emergency response activities following extensive coral bleaching episodes.

Phase 2 of RRAP should have a strong focus on:

- accelerating the operationalisation of coral seeding and settlement interventions and
- delivering a targeted research and development program focusing on:
    - increasing the impact of interventions through improved coral survival and heat tolerance; and
    - improving the cost-effectiveness and scalability of interventions and their monitoring.

Importantly, RRAP must be seen as complementary, and not as an alternative, to other existing or potential policy and regulatory measures such as improving water quality, reducing fishing pressure and expanding the extent of highly protected areas within the property. Most importantly, unless greenhouse gas emissions are rapidly reduced in Australia and globally, opportunities for coral survival will become vanishingly small, even with the RRAP program.

Resilience-based Management

2022 Reactive Monitoring Report recommendation(s)	**Recommendation O5**: Optimize the opportunity presented by the revision and update of the GBRMPA Blueprint for Resilience (that is scheduled for 2022) to more clearly demonstrate the actions that will be undertaken within the GBR to increase awareness of climate mitigation needs and present clear and actionable activities to reduce climate impacts on the OUV of the property.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	
2025 WHC 47 COM adopted decision	7. … encourages the State Party to establish effective mechanisms to mitigate negative impacts of extreme weather events to the OUV of the property;

The SoC report states that resilience-based management "*underpins the Reef Authority's approach to addressing and adapting to climate change*". Examples given in the report of this approach are the GBR Zoning Plan, which came into effect on 1 July 2004, over 20 years ago, and has not been updated since. Other examples cited are enforcing zoning compliance, suppressing crown-of-thorns starfish outbreaks, the Joint Reef Field Management Program and Traditional Owner collaboration. While these programs are all extremely important, they have been in existence for many years, while the impacts of climate change have become increasingly severe and frequent.

The SoC report states that GBRMPA's 2030 Blueprint "*sets out how the Reef Authority strengthens Reef resilience in the changing climate*." While the Blueprint repeated many of the Reef Authority's existing programs, it also stated (p.6): "We must be bold and innovative — do more with the tools we have and develop new tools and approaches to deliver our work."

The Reef Authority held a Forum in October 2025 to deliver on the Blueprint statement above. It is encouraging that the SoC states that "Insights from the Forum will inform future management decisions", however, these decisions must be bold and implemented with urgency reflecting the climate crisis facing the Reef. The highest priority should be substantially strengthened in-water spatial protection including removing fishing from high value refugia and connectivity reefs. This approach was outlined in the AMCS-WWF Emergency Response Plan shared last year with the World Heritage Centre and IUCN (see Attachment A).

Recommendations:

5. Urgently implement strengthened protection of high value refugia and connectivity reefs.
6. Integrate catchment and in-water initiatives by scaling up landscape repair, coastal ecosystem protection and pollution reduction aligned with greater in-water protections.
7. The Australian and Queensland governments should urgently implement an Emergency Response Plan to severe coral bleaching and other extreme weather events and report back to the World Heritage Committee in 2026 on progress.

2.2 Improving water quality on the Great Barrier Reef

The SoC report contains a lengthy section on the various initiatives underway to improve water quality entering the Great Barrier Reef from its catchments.

Both the Australian and Queensland governments have responded in part to the recommendations of the 2022 Reactive Monitoring Mission Report and subsequent World Heritage Committee decisions. Unfortunately, progress on reducing catchment-sourced pollution loads has been relatively slow, in part due to the scale of challenges involved. However, the urgency has never been greater. The 2022 Scientific Consensus Statement[53] (released in 2024) concluded that it is essential to achieve the water quality targets within the decade to enhance the resilience of the inshore ecosystems of the World Heritage property.

We remain concerned that this advice is not being heeded. Drafts of the Reef 2050 Catchment Water Quality Strategy (successor to the 2017-2022 Reef 2050 Water Quality Improvement Plan) have been disappointing and lack the ambition and scale of interventions required. We still have not seen a final strategy released, despite this being a clear commitment and requirement of the World Heritage Committee. While government investment to date has been significant at approximately $2.3 billion since 2003, it is less than one quarter of the investment estimated to be needed to

achieve water quality conditions to sustain the Great Barrier Reef's inshore ecosystems.[54] It is also important to note that not all this investment is in on-the-ground projects.

The SoC report presents generalised statements about water quality investments and the improvements achieved to date, but it includes few actual statistics to back the general statements. In several instances (e.g. protected area statistics, emissions reductions from agricultural land use, and waste and litter reduction), statements relate to state-wide results and not GBR regional results.

Unfortunately, the latest publicly available data on progress to water quality targets is the 2021 and 2022 GBR Water Quality Report Card.[55] Based on the current quantifiable reductions in pollutant loads, the progress achieved in the past 20 years is still well-short of the reductions needed, with current progress indicating that sediment reduction targets will not be met until 2047, and critical nitrogen targets will not be reached until 2114.

Following is an analysis of the adequacy of various government initiatives and recommendations for improvement.

2.2.1 Water Quality Programs

2022 Reactive Monitoring Report recommendation (s)	**Recommendation P1**: Identify priority areas of grazing land for gully repairs and associated restoration and remediation activities, and significantly scale up activities in these priority areas … to achieve existing WQIP targets. **Recommendation P5**: Ensure Reef 2050 WQIP water quality targets, to be updated in 2023, and actions implemented through the WQIP are sufficient to ensure the OUV of the property is not further adversely impacted by low water quality.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	Enact, with immediate effect, a major shift in water quality programs alongside an **AUD$1 billion water quality investment** through to 2030 with the aim to achieve the 2025 water quality targets and commence a drastic reduction in overall pollutant discharge into the property by 2030. **Commitments 1 & 2**: By 31 December 2023: ● deliver a complete mapping of all priority areas of grazing land for gully repairs and associated restoration and remediation activities, the identification of the priority gullies … and a detailed timeline for the completion of the repair of the areas of highest priority. ● initiate the delivery of a joint federal-state program that will start repairing and restoring the gullies of the highest priority with immediate effect
2025 WHC 47 COM adopted decision	**Decision 47 COM 7B.2, Paragraph 4**: Ensure that water quality targets and actions implemented through the updated WQIP are **sufficiently ambitious and funded** to ensure the OUV of the property is not further adversely impacted by low water quality.

While the Australian and Queensland governments highlight their substantial AU$1.8 billion investment from 2014-15 to 2030, the actual scale of the challenge requires a significant increase of

this investment, with a cost estimate from 2016 suggesting over AU$8.2 billion is needed to reach the 2030 (previously 2025) targets.[56]

While investments have increased, they remain fundamentally mismatched with the scale of the challenge and there is a lack of transparent reporting on water quality improvements achieved from these investments. Additionally, investments through the Queensland Reef Water Pollution Program currently are committed only until June 2026 and the SoC has provided no details on further proposed investments.

The SoC highlights two initiatives (the Landscape Repair Program and Clearer Water for a Healthy Reef) designed to deliver investment against prioritized pollution "hot spots" (relatively small areas that contribute a disproportionate amount of pollutant load to the Reef). This "hot spot" approach builds on the Reef Trust Partnership's (RTP) more focused approaches. However, it is important to note that, unlike sediment, hot spots of Dissolved Inorganic Nitrogen (DIN) pollution have not been mapped throughout the GBR's coastal lowlands or even in very high and high priority catchments. Considering that progress towards the DIN target has been particularly slow, taking another 90 years at the current speed, it is essential to implement a highly targeted approach, which relies on identifying pollution hotspots at a first step.

Disappointingly, there is no indication of the likely water quality outcomes from the above-mentioned programs. We understand that decision support tools (such as the Paddock to Reef Projector[57]), which were developed as part of the RTP, are available that provide reasonable estimates of outcomes from investment. An estimate of water quality outcomes resulting from these investments should be available.

To demonstrate the impact from public investments, a single publicly accessible database is urgently needed that can improve tracking and public reporting of pollution reductions achieved from all government-funded projects.

Recommendations:

8. To sustain the Outstanding Universal Value of the Reef and meet the water quality targets, a substantial increase in investment and an ongoing strategic and coordinated investment approach is required, focusing on the most cost-effective management interventions, targeting areas that contribute the highest pollution loads, and tailored to catchment-specific circumstances.
9. Establish a single publicly accessible database reporting at least annually on pollution reductions achieved from all government-funded projects.

2.2.2 and 2.2.3 Water Quality Improvement Plan and WQIP Review

2022 Reactive Monitoring Report recommendation(s)	**Recommendation P5**: Ensure Reef 2050 WQIP water quality targets, to be updated in 2023, and actions implemented through the WQIP are sufficient to ensure the OUV of the property is not further adversely impacted by low water quality.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	**Commitment 3**: By 30 June 2025: Finalise the independent water quality science review and the Scientific Consensus Statement as the foundational scientific understanding to underpin the revision of the Reef Water Quality Improvement Plan and the establishment of new water quality targets for the period 2025-

	2030, to ensure consistency with the management frameworks adopted in the Reef 2050 Plan.
2025 WHC 47 COM adopted decision	**Decision 47 COM 7B.2, Paragraph 4.** … requests the State Party to complete the updated Water Quality Improvement Plan (WQIP) by 2025 …

With the increasing impact of climate change on the Great Barrier Reef, the 2022 Scientific Consensus Statement (SCS)[58] concluded that it is essential to achieve the water quality targets within the decade to enhance the resilience of the inshore ecosystems of the World Heritage property.

Given this urgency, it is deeply concerning that an updated WQIP through to 2030 is not yet finalised, despite the consultation process starting in early 2024, almost two years ago, and the request by the World Heritage Committee to complete the updated WQIP by 2025. We understand the government plans to finalise the document by April 2026, however, March would be preferable, allowing the IUCN and World Heritage Centre more time to consider it prior to the 48th session of the World Heritage Committee.

The WQIP is now called the Reef 2050 Catchment Water Quality Strategy and has shifted to a whole of catchment, values-based approach. We are concerned that this broader goal diffuses the focus of the strategy and distracts from the primary purpose of the document which is to meet the water quality targets. The first draft of the Strategy was released in October 2025 and was strongly criticized by many Reef stakeholders. It lacked the technical underpinnings of previous strategies and failed to demonstrate how the latest scientific evidence and lessons from earlier plans inform proposed management actions. It also did not include any water quality, land management or catchment targets or any clear timeframes. Instead, it represented a broad framework that lacked focus and a clear and actionable pathway towards meeting water quality targets.

An “in confidence” second draft was provided to a limited number of sectors in December 2025. It was an improvement but still lacked sufficient ambition and detail to provide confidence that the desired water quality, land management and catchment targets will be achieved by 2030 (previously 2025). In addition, some targets in the second draft remain weaker than those in the 2017–2022 WQIP. For example, the draft riparian vegetation target was downgraded from an “increase in riparian vegetation” to “no net loss of riparian vegetation”. This should be strengthened to an absolute gain (i.e. not a “net gain”).

We are also concerned about the credibility of the land management targets and the effectiveness of their implementation. The most recent publicly reported data (2019) indicated that none of the five industries were on track to meet the 2025 target of 90% of land being managed under best practice systems (see Table 2 below). The most recent Reef Report Card (2021-2022) did not report progress toward these targets, reducing transparency at a time when there was a significant gap between what was being achieved and what was required.

In May 2023, the Australian Environment Minister significantly weakened commitments to achieving these targets to “*50% of sugarcane and banana areas operating above minimum practice standards by June 2026*” without justification and only referring to two industries. The removal of public reporting and the reduction in ambition, limits confidence that land management settings are sufficient to achieve water quality targets by 2030.

The most recent cost estimate for achieving the water quality targets is now almost 10 years old. An updated cost analysis is urgently needed that estimates the cost of actions required to achieve the revised water quality, land management and catchment targets.

Table 2. Progress towards Land Management Targets and commitments reported as percentage of landholders adopting BMPs.

Industry	2019 Reef Report Card[59]	State Party Report 2025	SOC report 2026
Sugarcane	12.7%	44%	44.3%
Grazing	36.2%	Not reported	Not reported
Banana	65.4%	Not reported	Not reported
Horticulture	28.7%	Not reported	Appendix B: approx. 32% Section 2.2.7: 34.8%
Grains	39.4%	Not reported	Not reported

Recommendation:

10. The Australian and Queensland governments must finalise a technically-sound, ambitious catchment water quality strategy no later than March 2026, with updated water quality targets. The final strategy must include:
    a. A primary focus on delivering the water quality targets by 2030 and include the repair and restoration of coastal wetlands and riparian ecosystems as a major new initiative.
    b. Land management and catchment-specific targets that align with the 2030 timeframe for achieving the water quality targets. Catchment specific targets should include a real gain in riparian and wetlands extent and condition.
    c. A long-term investment roadmap including an updated cost estimate of meeting revised water quality and land and catchment targets by 2030.

2.2.4 Reef 2050 Wetlands Strategy

2022 Reactive Monitoring Report recommendation (s)	**Recommendation P3**: **advance the upscaling of land restoration activities**, including where feasible the purchase and/or buy-back of land areas for restoration and **return to wetland or riparian ecosystems**.
May 2023 Letter from Australian Environment Minister to UNESCO	**Commitment 5**: By February 2025: accelerate progress to achieve all water quality targets through a program of sediment, nutrient and pesticide reduction through combined efforts in regulation, incentives, and **accelerated landscape restoration programs**.
2025 WHC 47 COM adopted decision	2. Recalling Decisions **45 COM 7B.13** and **46 COM 7B.62 …** [**45 COM 7B.13** Notes with appreciation the State Party's initial commencement of the implementation of the 2022 Reactive Monitoring mission recommendations, and requests the State Party to extend these efforts to fully implement all the recommendations of the mission]

The SoC report largely ignores the RMM Recommendation P3 to pursue **land buy-backs** in marginal agricultural areas, providing little evidence of a coordinated, large-scale implementation of this approach.

The **Reef 2050 Wetlands Strategy** and recent funding of the **AUD$50 million Reefwise Wetlands Program** represent initial steps towards a more holistic approach in Australia's Reef Water Quality programs.

The Reefwise Wetlands Program is specifically targeted at pollution hot spots and focuses on rehabilitation and restoration of wetlands to reduce nitrogen pollution. The program will be delivered over longer time frames and larger spatial scales which is a positive development. However, funding recipients have not been announced almost one year after the application deadline, impeding evaluation of the program's potential outcomes at this stage. In addition, there is no comprehensive mapping of Dissolved Inorganic Nitrogen (DIN) hot spots in priority catchments to direct rehabilitation and restoration investments to the locations where they can achieve the most pollution reductions.

In contrast, the AU$28.5 million Reef Coastal Restoration Program announced in mid-2024 is still comprised of small-scale and short-term competitive grants, incompatible with the long-term water quality improvements that are needed.

Recommendations:

11. Increase investments to deliver long-term and large-scale wetland rehabilitation projects in DIN pollution hotspots.
12. Ensure Queensland government funded rehabilitation and restoration programs align with the Reef 2050 Wetlands Strategy and target pollution hotspots in coordination with the Reefwise Wetlands Program.

2.2.5 Regulating land clearing

2022 Reactive Monitoring Mission report recommendation	**Recommendation P4: Prioritise the protection of remnant native vegetation across the GBR catchments** through strengthened native vegetation clauses under existing laws, and through improved identification and enforcement of permissible activities in areas of high conservation value (HCV) forests and woodlands. This would include review of sites where clearing is currently allowed without permits (Category X under the Vegetation Management Act 1999) and updating zonation and corresponding permits which limit conversion of HCV areas. Such advances should also incorporate full consideration of traditional owner land management principles.
May 2023 Letter from Australian Environment Minister to UNESCO	**Commitment 4.** By July 2024: expand the implementation of 2018 land clearing legislation and further strengthen protection to remnant and high value conservation areas, including, through an accelerated and enhanced compliance program to secure the protection of remnant native vegetation in areas of high conservation value in the Reef catchments.
2025 WHC 47 COM adopted decision	**Decision 47 COM 7B.2, Paragraph 4.b)** Strengthen clauses under existing laws to ensure that all remnant and high value growth areas are protected, including category X vegetation (under the Queensland

	Vegetation Management Act), and other high priority areas including riparian zones, lands vulnerable to degradation and areas contributing to sediment and nitrogen pollution.

Page 35 of the Australian Government's SoC report gives an accurate account of woody vegetation clearing in the Great Barrier Reef catchment. The data is derived from the Queensland Government's latest annual vegetation clearing update (SLATS 2022-23) showing a 3% increase in clearing compared to the previous year.

The Mission report and 47COM decision called for regulatory action to strengthen protection of vegetation. The May 2023 commitment by the former Minister implied that the Queensland Government would act to strengthen its *Vegetation Management Act 1999*, as it did in 2018. This did not occur.

Therefore, the Australian Government acted late last year and passed amendments to the *Environment Protection and Biodiversity Conservation Act 1999* which respond substantially to the WHC decision and Mission report. Land clearing within 50 metres of a Reef watercourse, wetland or drainage line within the GBR catchment, and clearing of vegetation that has not been cleared for a period of at least 15 years, is to be assessed under the Act to ensure that the clearing does not have a significant impact on the Great Barrier Reef Marine Park and World Heritage property.

Under Queensland law, high value regrowth is defined as vegetation that has not been cleared for at least 15 years. The amendments passed late last year therefore respond directly to the Committee's request to protect high value regrowth. The amendments also protect remnant (vegetation that has never been cleared or has regrown to maturity). They apply to Category X, which is vegetation that is exempt from all Queensland clearing restrictions. The amendments do not guarantee full protection but ensure that the potential impact of clearing on the World Heritage property is assessed and approved or rejected. We hope that very few, if any, clearing applications are approved, given the urgency to improve Reef water quality.

The federal amendments came into effect immediately to avoid 'panic clearing' (that is, a rush to clear vegetation before stronger clearing controls come into effect). Despite this courageous step by the government, there have been anecdotal reports of immediate illegal clearing. The success of these landmark changes depends on an effective compliance program. It is crucial that the federal environment department monitors and enforces the new law until the new National Environmental Protection Agency takes over that role on 1 July this year.

The new federal regulations do not respond directly to the Committee's request to protect vegetation on lands vulnerable to degradation. It should now be up to the Queensland Government to strengthen Queensland's vegetation law to restrict clearing on erosive soils. This is another important step to reduce sediment runoff to the Reef.

As in previous Progress Reports, the Queensland Government's contribution to this section 2.2.5 of the SoC report is to focus on voluntary initiatives such as the establishment of protected areas has done very little to reduce vegetation clearing in Queensland as they have been placed in areas where deforestation is not an issue. In addition, the Land Restoration Fund is mentioned but we note that the last round of funding was made in October 2023 by the previous Queensland Government.

We continue to support the state government's world-leading SLATS program and, as stated in our critique of the 2025 Progress Report, we fully support the investment in early detection of illegal clearing and compliance.

Finally, 2.2.5 includes a paragraph about carbon emissions from vegetation clearing. The paragraph refers to the Australian Government's National Greenhouse Gas Inventory and states that "Queensland's land sector is now a net carbon sink rather than an emitter". It is important to note that 1) many environmental scientists have criticised the NGGI for using highly favourable accounting methods such as those negotiated by Australia under the Kyoto Protocol; 2) the reference is to Queensland's land sector which covers significantly more than woody vegetation; and 3) the paragraph refers to the state of Queensland, not the GBR catchment. In this regard, it is worth noting that the latest SLATS report found: "At the end of the 2022–23 monitoring period, Queensland had 94,928,709ha of woody vegetation. This represents a net reduction of 186,694ha in the extent of the state's woody vegetation for the monitoring period."

Recommendations:

13. The Australian government must, as a matter of urgency, ensure that landholders in the GBR catchment are fully aware of the new native vegetation clauses in existing federal legislation; ensure real time monitoring of native vegetation extent in the catchment; and undertake enforcement action if any illegal clearing.
14. The Queensland government should as a matter of urgency amend the *Vegetation Management Act 1999* to align with the EPBC Act vegetation reforms.

2.2.6 Compliance with Reef protection regulations

2022 Reactive Monitoring Report recommendation (s)	**Recommendation P3**: Increase significantly the scale and pace of adoption, **monitoring and enforcement** of best management practice in sugarcane and banana farming to achieve WQIP targets. **Recommendation P5**: Ensure Reef 2050 WQIP…is implemented... with associated **legislative compliance strengthened**. **Recommendation 03:** Prioritize delivery of new and sufficient research into the impacts of emerging replacement crops in former cane-farming regions (e.g., macadamia nut, avocado, etc.) to ensure impact on GBR is well understood and **set minimum practice standards** in accordance with WQIP targets based on this research, to promote industry best-practice within GBR catchment.
May 2023 Letter from Australian Environment Minister to UNESCO	**Commitment 6**: By January 2024: **Double compliance activity** being undertaken across the regulated reef catchment areas comparative to what was being achieved in 2021 in order to **enforce landholder compliance with reef protection regulated standards** and respond to any non-compliance.
2025 WHC 47 COM adopted decision	**Decision 47 COM 7B.2, Paragraph 4c)**: Ensure full compliance with Queensland's Reef Protection Regulations.

This section of the SoC provides very limited detail of actual compliance activities. In May 2023, Australia committed to "***double compliance activity*** *being undertaken across the regulated reef catchment areas comparative to what was being achieved in 2021*".

In their 2024 Progress Report to UNESCO, the Australian Government stated: "*The number of reef compliance officers in 2023 has more than doubled compared to 2021, and consequently, compliance activity has substantially increased, and the target of doubling physical (on-farm) inspections has been exceeded*". However, the number of reef compliance officers and physical (on-farm) inspections was not reported.

The number of reef compliance officers for 2021 is not available, but in 2022, the RMM report noted: "*There are currently only ~20 compliance staff under DES distributed across catchments, though plans are in place to double this workforce*".

In the mid-2021 to mid-2022 reporting period, the Queensland government reported that 129 initial compliance engagements and 141 additional follow-up compliance activities were completed.[60] Considering there are 12,600 landholders in Reef catchments across all regulated industries, this equals 1.02% of landholders, less than 11 per month, inspected in 2021-22.[61] During the 2023–24 financial year (1 July 2023 to 30 June 2024) there were 261 compliance inspections, representing 2.01% of Reef catchment landholders, and less than 22 per month.[62]

The SoC report (Appendix B) states that in "*2024–25 approximately 334 farming enterprises*" were inspected. This represents 2.65% of landholders and equals less than 28 inspections per month and less than one inspection per reef compliance officer per month (we understand that there are at least 30 compliance officers).

While the numbers in the SoC report statistically double the compliance activity, covering 2.65% of all landholders in the Reef catchment area (almost half of whom were non-compliant), it is incompatible with the RMM mission recommendation to "**increase significantly the scale and pace of adoption, monitoring and enforcement**" and is far from achieving the World Heritage Committee's request in July 2025 to the State Party to "**Ensure full compliance with Queensland's Reef Protection Regulations".**

Full compliance with the RPR is estimated to contribute 31.5% progress towards the dissolved inorganic nitrogen (DIN) water quality targets and provides a cost-effective and immediate action the Queensland government can take to accelerate progress towards meeting the water quality targets.[63]

It is unfortunate that the Queensland government's Reef Compliance Dashboard has not been updated over the last 12 months, with the latest data up to December 2023. In our critique of last year's State Party Progress report, we stated:

"The dashboard shows that across the three industries, almost half of the inspected businesses were not compliant with the regulations at first contact with a compliance officer (sugarcane: 42.8%, banana: 45.5%, grazing: 48.3%). The reported data suggests that only 28.6% of sugarcane businesses (data only available for sugarcane) were non-compliant at follow-up visits by compliance officers. This demonstrates the importance of an ongoing and well-funded program to drive compliance with the Reef Protection Regulations."

Regulated minimum practice standards for emerging crops, including horticulture and grains, have still not been developed. Although they occupy a relatively small area in the Reef catchments (<0.2%), some areas are rapidly switching crops which contribute nutrients, sediments, and pesticides to waterways that can have significant local impacts on Great Barrier Reef water quality.

Recommendations:

15. Ensure full compliance with Queensland's Reef Protection Regulations by:
    a. substantially increasing compliance activity and enforcement from what is currently achieved;
    b. providing publicly available transparent reporting on compliance activity and landholder compliance on the Reef Compliance Dashboard at least yearly.
16. Develop regulated minimum practice standards under the RPR for emerging crops, grains, horticulture, macadamias and other agricultural commodities that are produced in catchments that discharge to the Great Barrier Reef.

2.2.7 Best practice land management

2022 Reactive Monitoring Report recommendation (s)	**Recommendation P3**: Increase significantly the scale and pace of **adoption, monitoring and enforcement of best management practice** in sugarcane and banana farming to achieve WQIP targets
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	**Commitment 6**: Secure improved water quality outcomes by supporting increased industry participation in best management practice projects and programs, with **50% of sugarcane and banana areas operating above minimum practice standards by June 2026**
2025 WHC 47 COM adopted decision	**Decision 47 COM 7B.2, Paragraph 4d)**: **Ensure that all Best Management Practice programmes effectively deliver water quality improvements**

While the SoC provides some detail on the significant government investment into voluntary practice change programs, including industry-led Best Management Practice (BMP) programs, we remain concerned about the effectiveness of this investment given the relatively slow progress in increasing the numbers of landholders participating in these programs. We are also concerned about the lack of any direct publicly available evidence of water pollution reductions being achieved due to BMP programs.

The Queensland Reef Water Quality Program has heavily relied on voluntary, industry-led BMP programs to encourage improved land management practices to reduce water pollution. Between 2015 and 2024, the major area of investment by the Program has been directed toward practice change programs ($137 million or 31.4% of Program funding).[64] However, industry-led BMP programs are designed, primarily, to increase the adoption of farming practices that maximise productivity and profitability and only secondarily to improve water quality.

Except for the sugarcane and banana industries (the only two government-accredited programs) and the government-led Grazing Resilience and Sustainable Solutions (GRASS) program, other BMP programs (e.g., for horticulture) are currently not required to report information on participation, nor do they guarantee that farmers meet regulated minimum practice standards under the Reef Protection Regulations.

The SoC report highlights investments made towards BMP programs and "*great progress being made in engaging with industry*". The report shows a 44.3% adoption of BMP programs in sugarcane, only a 0.3% increase since February 2025, and 32% increase in horticulture, only a 3.3% increase since 2019 (see Table 2 above). No evidence of progress has been provided for other

industries nor how the reported progress translates into actual water quality improvements. Without consistent reporting requirements for BMP programs there remains a complete lack of evidence on whether BMP programs **effectively deliver water quality improvements**.

Australia is not on track to achieve the RMM recommendation P3 ("*increase significantly the scale and pace of adoption of best management practice in sugarcane and banana farming*") nor is it on track to achieve the WHC 47 COM request 4d) ("*Ensure that all Best Management Practice programmes effectively deliver water quality improvements*"). However, a recent government review of the land management practice targets provides a significant opportunity to develop targets at a regional scale and for each industry.[65]

Recommendation:

17. Ensure that all Best Management Practice programs effectively deliver water quality improvements, meet and exceed regulated minimum practice standards, are government-accredited, and publicly report water pollution load reductions annually.

2.2.8 Waste and Litter

2022 Reactive Monitoring Report recommendation(s)	**Recommendation O2:** Effectively enforce the Waste Reduction and Recycling (Plastic Items) Amendment Act, including by developing partnerships with existing civil society initiatives focused at: (a) reducing primary production and consumer purchase of single-use plastics goods; (b) repurposing of waste; (c) reimagining of products to transition to renewable materials (e.g., packaging); (d) recycling; and (e) proactive removal of debris.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	
2025 WHC 47 COM adopted decision	2. Recalling Decisions **45 COM 7B.13** and **46 COM 7B.62 …** [**45 COM 7B.13** Notes with appreciation the State Party's initial commencement of the implementation of the 2022 Reactive Monitoring mission recommendations, and requests the State Party to extend these efforts to fully implement all the recommendations of the mission]

Marine debris can be lethal for marine biodiversity in the Great Barrier Reef as well as impact tourism and community values. The 2024 GBR Outlook Report found that the Region is vulnerable to debris from both local and more distant sources.

Since 2019 the *Reef Clean* Program has removed over 140 tonnes of marine debris from the GBR and collected over 2.6 million marine debris items. Over 80% of this debris is plastic, with microfibers and microplastics posing severe threats to a diverse range of marine species including corals and fish, while larger items are known to entangle and kill turtles, dugongs, and seabirds.

Ingestion of plastic by small post-hatchling turtles who feed at the surface, is increasingly reported in the GBR. Gut impaction because of plastic ingestion poses a risk to marine turtles in the region. In addition, plastic pollution has accumulated on some GBR islands.

The Outlook Report found, "Given the rapid increase in plastic production globally, the longevity of this material and the disposable nature of plastic items, plastic marine debris is likely to persist into the future and be present at a broad scale within the Region." It identified the potential risk to the ecosystem from marine debris as High (p.530).

Recycling alone will not end plastic pollution; a full lifecycle approach is needed to stop plastic pollution at source. This requires action at the global level through a strong Global Plastics Treaty and at the national, state (Queensland) and local council level.

2.3 Working with Great Barrier Reef Traditional Owners

2022 Reactive Monitoring Report recommendation(s)	**Recommendation O11:** Ensure that all relevant stakeholders review the Traditional Owner Implementation Plan and provide input to enable its finalization, adoption and roll out in the coming months and years in order to improve engagement and representation of TOs in co planning and co-management that is vital for the future of the property and the region.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	
2025 WHC 47 COM adopted decision	Para 6 – Encourages the State Party to support the Traditional Owner Taskforce, as appropriate, in its mandate to lead the delivery of the Reef 2050 Traditional Owner Implementation Plan.

First Nations peoples are the Traditional Owners and the first managers of the Great Barrier Reef and we respect their ongoing cultural authority in managing their Sea Country for current and future generations. As such, we believe it is most appropriate for the Reef's traditional owners to provide their view on the adequacy of support provided to the Reef Traditional Owner Taskforce and the progress made on the Reef 2050 Traditional Owner Implementation Plan.

WWF-Australia does have long term relationships with many Traditional Owner groups along the reef coast including a partnership with the Girringun Aboriginal Corporation for the last 15 years.

One issue that has been raised for many years, including with WWF-Australia, is the inequality regarding enforcement and compliance rights provided to Indigenous Rangers operating in the Great Barrier Reef. This issue was highlighted in our critique of Australia's 2025 GBR Progress Report, and remains unresolved.

The following information is provided by the Girringun Aboriginal Corporation:

"To enable Traditional Owners to fulfil their cultural responsibilities in caring for their Sea Country, they need effective mechanisms to enforce compliance within their territories. Indigenous Rangers are already actively managing Sea Country in the Great Barrier Reef daily and could do so more effectively if they had the authority to enforce compliance with legislation for Indigenous Rangers who may wish to. Amendments to relevant Commonwealth and State legislation could extend enforcement powers to Indigenous Rangers, allowing them to manage Sea Country more effectively.

Enforcement powers are vitally important for Indigenous Rangers Traditional owners within the Great Barrier Reef (GBR) hold cultural responsibilities to care for their Sea Country as they have done

for tens of thousands of years across deep time and back to the stories of Dreaming. Through Indigenous Rangers, Traditional owners are able to act on these cultural responsibilities, and actively manage and care for their Countries. Many Indigenous Rangers within the GBR aspire to offer services to regulatory agencies on a fee-for-service basis. This requires the capacity to ensure compliance with the legislation and regulations of the agency to which services are to be provided. Whilst some Indigenous rangers have participated in a Certificate IV course in regulatory compliance, more staff will need the training. Also, Indigenous Organisations that host Indigenous Compliance Rangers need to have in place the necessary compliance management model, processes and systems that align with the methods used by the agencies using the services. To build specialist Compliance Management Capacity within Indigenous Organisations, requires external support and a funding stream."

2.4 Sustainable Fisheries

Introduction

While the Queensland and Australian governments have made further progress in implementing some of the fisheries recommendations of the mission report and the 2025 WHC 47 COM 7B.2 Decision, the implementation of key measures such as independent monitoring of trawl vessels likely falls short of UNESCO and IUCN expectations.

Given the escalating disturbance events impacting the health of the GBR, a more urgent and ambitious response to the impact of the Queensland Coral Fishery is required than that detailed in Recommendation O10 of the mission report. The next 12 months will be crucial for the development and implementation of a plan to support the Queensland Coral Fishery to transition from wild-caught coral to tank-based coral aquaculture by December 2028.

2.4.1 Net Fishing

2022 Reactive Monitoring Report recommendation (s)	**Recommendation P10: Phase out destructive gill net fishing in the property** through appropriate mechanisms, including purchasing, and/or retiring all remaining industrial (N4) gill-net licences; retiring of other gill-net fisheries (N2) and the establishment of net-free sub-zones in areas of high conservation value for protected species.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	1. Phase out all destructive gillnet fisheries to ensure the property as a whole will be gill-net free by 30 June 2027. 2. Establish a complete net free zone in the Northern third of the property (Cape Bedford to the tip of Cape York) and establish additional net-free-zones that expand net restrictions in the Gulf of Carpentaria (e.g., Mornington Island, rivers/foreshores adjacent to Weipa, Karumba and Mapoon), to further strengthen protections for threatened species that move between Great Barrier Reef and the Gulf, and ensure displaced fishing effort does not intensify threats to those species, as well as in other high value habitats of protected species identified through consultation, by 31 December 2023.
2025 WHC 47 COM adopted decision	requests the State Party to ensure that: The property is fully gillnet-free by mid-2027 at the latest,

The phase out of large mesh gillnet fishing from the Great Barrier Reef by June 2027 appears to be largely on track. Statements by the Queensland Fisheries Minister and Queensland Environment Minister made in Parliament in August 2025 suggest that no changes to gillnet policy will be made.[66,67]

We remain concerned about potential inaccurate reporting of Threatened, Endangered and Protected Species (TEPS) mortalities, delayed mortality and sublethal impacts on entangled threatened species within the fishery. Full removal of gillnets from the World Heritage property in 2027 will contribute significantly to the resilience of these threatened species.

At present threatened species interactions reported by fishers are made publicly available on a monthly basis. In 2025, 27 transitional NX licenses were operating in the World Heritage property, with fishers reporting a total of 923 interactions with threatened species, resulting in 120 mortalities. Interactions were dominated by 436 scalloped hammerhead sharks (47% of interactions), but also included one dugong, one bottlenose dolphin, two humpback whales, 10 saltwater crocodiles, 11 sea snakes, 91 turtles (10% of interactions), and 371 sawfish (40% of interactions). To date mortalities have only been recorded for scalloped hammerhead sharks (117) and narrow sawfish (3). Fishers are currently reporting threatened species interaction rates 14 times higher in the NX fishery compared to the seven years 2017-2023, equating to a threatened species caught every 2 days fished.

Despite better net attendance measures, there is significant inconsistency between reported survival rates and documented gillnet mortality. Documented mortality rates for species such as the narrow sawfish being as high as 50-100% and 72-99% for scalloped hammerhead sharks in Australian gillnet fisheries.[68,69]

Despite the implementation of electronic monitoring, no summary data from electronic monitoring is currently made publicly available. We note that the SoC report states that as of May 2025, 26% of NX fishing days had been independently reviewed, however, it is not clear whether discrepancies between reported interactions and electronic monitoring data exist. From our discussions with fisheries managers, we understand that identifying the release fate of threatened species from NX electronic monitoring data is extremely challenging, which undermines confidence in the accuracy of mortality reporting by commercial fishers.

We note that the World Heritage Committee decision 46 COM 7B.63 requests that new Net-Free Zones in key habitats for species that represent attributes of OUV are established. To date this has only partially occurred, and while existing Net-Free Zones protect key habitats for some species, we note biologically important areas and key habitats for dugongs, turtles, dolphins and sawfish outside of Dugong Protection Areas (DPAs) remain open to fishing.[70] We are not aware of any evidence to support the assertion in the SoC report that risks to threatened species in the DPA B rivers and creeks are broadly lower compared to other habitat areas, especially given the known habitat importance of rivers and creeks to many threatened species and in particular, sawfish.[71]

While our organisations support the trial of alternative gears to support an inshore fishery in the Great Barrier Reef, it is essential that any approved fishery does not impact threatened species or the OUV of the World Heritage property, whilst also being socially acceptable and economically viable. At present trials of tunnel nets are provoking concerns amongst stakeholders due to the potential to interact with threatened species, particularly if larger and heavier mesh is used in the wings of the net, as well as the catch and harvest or subsequent release condition of large volumes of fish species not historically caught by commercial fishers and of high value to recreational fishers. Commercial fishers have also stated that for the fishery to be viable it must be permitted to operate in DPAs and Yellow Conservation Park Zones.

While we await further data from alternative gear trials, and at this stage there is no suggestion that a tunnel net fishery will be permitted in the World Heritage property, we strongly recommend that UNESCO and IUCN reaffirm their position that the property remains free of large mesh gillnets, including those that may be used in the wings of a tunnel net, and that any form of net fishing (other than bait nets), including tunnel nets, is not permitted in DPAs or Yellow Conservation Park Zones in the 2003 GBR Zoning Plan.

Recommendations:

18. The Queensland Government expands Net-Free Zones to incorporate biologically important areas for threatened and endangered species, with a particular focus on species that represent attributes of OUV.
19. The Australian and Queensland Governments complete the phase out of gillnet fishing by June 2027.

2.4.2 Independent Data Validation

2022 Reactive Monitoring Report recommendation (s)	**Recommendation O7:** Develop and implement appropriate mandatory independent mechanisms for discard and bycatch monitoring, such as e-monitoring via vessel-based cameras, on all gill-net and trawl vessels within the property.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	4. By 1 December 2023, introduce legislation to mandate the use of Independent Data Validation on all commercial fishing vessels.
2025 WHC 47 COM adopted decision	requests the State Party to ensure that: Monitoring of trawl fisheries includes comprehensive transparency and accountability mechanisms, based on adequate data,

The Queensland government has made significant progress towards the implementation of Independent Data Validation in the gillnet and trawl fisheries. All gillnet vessels operating in the World Heritage property have electronic monitoring systems, and in January 2026 the Queensland government announced their policy to implement electronic monitoring cameras in the trawl fishery from June 2026.

The Queensland government has committed to implement independent data validation in the trawl fishery over a period of six years commencing in June 2026. Electronic monitoring systems will be installed on vessels representing 90% of the fishing effort, with 25 systems installed in each of the first two years of the program on vessels operating within the World Heritage property. The government has proposed to undertake a risk-based footage review, however, has not publicly committed to a minimum level of footage that will be reviewed for threatened species interactions.[72]

Our organisations note that this is a significant step forward for the trawl fishery, and will provide vital transparency for fishery managers, threatened species experts and the public. However, there are a number of flaws in the proposed implementation of the program that weaken its ability to collect accurate data on the impact of the fishery and which do not meet the requirements of the recommendation outlined in the RMM Report.

RMM recommendation O7 explicitly states that independent monitoring should be present on all gillnet and trawl vessels within the property, however, the Queensland government has proposed to install electronic monitoring systems on vessels that represent 90% of the fishing effort. In reality,

this means that systems will be installed on 164 of the 243 active trawl fishing vessels, representing 67% of vessels.

Risk to threatened species is likely strongly influenced by fishing location, gear, fisher behaviour and seasonality. Fishers operating in high-risk areas, at times of high threatened species activity are just as likely to interact with threatened species regardless of whether they meet a defined effort threshold to require independent monitoring or not. Furthermore, research has found that interactions with threatened species are driven by fisher behaviour and fisher skill.[73] Should the less active vessels that are out of scope for electronic monitoring implementation be operated by less skilled or experienced fishers, then their bycatch rates may be significantly higher than those of the in-scope fishers. These issues raise concerns regarding the accuracy of assumptions that can be made regarding the overall impact of the fishery on TEPs and non-target species.

It has been noted that the installation of electronic monitoring leads to behaviour change and improved reporting behaviours.[74] However, the absence of independent observation can lead to observer effects where fishers change their behaviour when independent observation is occurring. This can include where fishing takes place (for example fishing in an area where bycatch of threatened species is known to be lower), or changed operational behaviours, such as correctly reporting bycatch or changing handling procedures. Under the proposed implementation, the 79 active vessels without electronic monitoring may undertake less sustainable fishing practices including illegal practices such as the misreporting of threatened species interactions, in the knowledge that they are not under direct observation.

The government's implementation schedule is also insufficient to obtain robust spatially representative data on the impact of trawl fishing within the World Heritage property in a suitable timeframe. The six-year implementation schedule means that half of all trawl vessels will not have independent monitoring until 2030 at the earliest.

The government has also stated that a risk-based approach will be applied to the review and validation of camera footage without explicitly stating a minimum or target footage review rate. Footage review is essential to identify threatened species interactions and validate fisher logbooks to ensure reporting is accurate. Without sufficient footage review the program will fail and risks to threatened species and the World Heritage property cannot be addressed.

The scientific literature notes that electronic monitoring footage review rates should be optimised to program objectives.[75,76] For rare events like TEPs interactions this requires high rates of review, typically above 50% in order to have confidence in the data collected. Pierre *et al* (2022) [77] note that for TEPs interactions occurring on 10-25% of sets, optimised electronic monitoring footage review of 10-50% of footage is required. This is likely to be of the order of footage requiring review in the red spot king prawn sector of the Central Trawl Region. Whilst other sectors of the fishery are considered to have lower rates of TEPs interactions, there remains considerable uncertainty regarding these assumptions due to the deficiencies identified with current reporting. Pierre *et al* (2022) recommend optimised footage review of 75-100% of footage for TEPs interactions occurring in less than 10% of sets. These recommended review rates are considerably higher than the 10% footage review rate upon which modelling assumptions and recommendations have been made in the impact analysis statement.[78]

The Queensland government often cites footage review rates of 10% used in Commonwealth fisheries as a benchmark for footage review, considerably below that in place in similar international fisheries and what should be expected within a World Heritage property. There are many case studies of higher review rates being used in fisheries worldwide with full implementation of electronic monitoring on fleet sizes similar to that of the trawl fishery.

A recent overview of the rollout of electronic monitoring in New Zealand inshore fisheries conducted in 2024 noted that as of February 2024 cameras had been deployed on 119 vessels and approximately 30% of fishing events had been reviewed, noting "*this is the general level of review that Fisheries New Zealand is expecting for the initial stages of the on-board camera rollout.*"[79]

Many US fisheries also utilise electronic monitoring to identify catch and bycatch in fisheries including demersal trawl fisheries. In 2023 footage review rates for the audit model electronic monitoring program for the Northeast Multispecies Fishery were set at a minimum of 35% of footage, and 50% of footage for new vessels or those operating under the maximized retention electronic monitoring program[80].

High rates of footage review and investment in AI footage review will be vital to ensure the success of the program and are the minimum standard within a World Heritage property.

Recommendations:

20. The Queensland Government prioritises the implementation of electronic monitoring on all active trawl vessels by December 2028.
21. The Queensland Government ensures that a statistically robust proportion of electronic monitoring footage required to accurately identify interactions with threatened species is reviewed. A minimum of 20% of electronic monitoring footage is cross checked with fisher logbook reporting.
22. The Queensland Government publishes summary data from electronic monitoring systems on threatened species interactions and their fate (alive, injured, dead) each quarter, no more than three months in arrears. Discrepancies between logbook data and independent monitoring should also be made publicly available annually.

2.4.3 Implementation of the Queensland Sustainable Fisheries Strategy

2022 Reactive Monitoring Report recommendation (s)	**Recommendation P9**: **Accelerate the implementation of the Queensland Sustainable Fisheries Strategy**, including the finalization of harvest strategies for all key species as a priority, and ensure management mechanisms outlined in the Strategy (including temporary closures of some fisheries areas to enable recovery and promote restocking, particularly in areas of spawning aggregations) are implemented in collaboration with the fisheries industry to achieve the target maximum economic yield (60% biomass) by 2027.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	3. By 31 December 2023, complete implementation of the Sustainable Fisheries Strategy, including finalising all harvest strategies with defined quotas for all key species, and by 31 December 2027, working to achieve the target maximum economic yield (60% biomass)
2025 WHC 47 COM adopted decision	requests the State Party to ensure that: All aspects of the Queensland Sustainable Fisheries Strategy are fully implemented, in particular species harvest strategies

In the last 12 months there has been little progress by the Queensland government in fully delivering the Sustainable Fisheries Strategy. While the Strategy has not been formally abandoned by the new Queensland government, a five-year Fisheries and Seafood Action Plan is currently in development and is likely to replace the Sustainable Fisheries Strategy in driving fisheries policy.

The SoC report states that 30 of the 33 actions have been completed, however, our analysis suggests that 26 of the 33 actions have been *appropriately* implemented. Key actions like undertaking regular stock assessments are not occurring for many target and secondary species within the World Heritage property, and some harvest strategies are either ineffective or inappropriately implemented.

Many of the 2027 targets of the Strategy are unlikely to be achieved. In particular, building all fish stocks to 60% of unfished biomass, ensuring no species are depleted or subject to overfishing, and maintaining Wildlife Trade Operation accreditations for all fisheries (which provide for the export of fishery products and indemnity for incidental interactions with protected species).

Of most significance is the abandonment of the 60% biomass target for Spanish mackerel. In January 2026 the Queensland Minister for Primary Industries announced that Spanish mackerel will be managed to a target biomass of 48% of unfished levels, while also increasing the commercial catch quotas by more than 50% and doubling the recreational possession limit[81].

Spanish mackerel is an iconic species in Queensland, and an important higher order predator on the Great Barrier Reef. Spanish mackerel recruitment into the fishery has also been shown to be more successful in years of lower sea-surface temperatures,[82] suggesting that climate change will have a negative impact on future recruitment. The reduction of the biomass target will lead to increased catches of Spanish mackerel and a lower resilience of the species to overfishing, climate change and other environmental stressors.

The reduction of the biomass target is explicitly contrary to Australia's commitments to UNESCO (Fisheries commitment 3),[83] Queensland's Sustainable Fisheries Strategy 2017-2027 and Harvest Strategy Policy, as well as the requests of the World Heritage Committee outlined in decisions from the 45th, 46th and 47th sessions of the World Heritage Committee. Our organisations are extremely concerned that this may be the first of many species to have their biomass targets reduced from 60% of unfished levels, potentially under the 5-year Fisheries and Seafood Action Plan in development.

While we acknowledge that the latest stock assessment shows that Spanish mackerel is no longer depleted, we also hold concerns regarding the premature increases to the commercial catch quotas and recreational possession limits that are being implemented despite considerable uncertainty in stock health indicators and the long-term decline in Spanish mackerel populations.[84]

At present, four stocks remain depleted or overfished within the World Heritage property: saucer scallop, snapper, scalloped hammerhead and great hammerhead. Saucer scallop and snapper remain open to fishing within the World Heritage property, despite their depleted status. A number of other fish stocks (e.g. saddletail snapper) are currently fished to levels considerably below the 60% target biomass, with management action to build their populations lacking.

While we acknowledge that the Queensland government has harvest strategies in place for all fisheries that operate within the property, we are concerned that a number of these harvest strategies are not fit for purpose or are not being appropriately implemented. The East Coast Inshore Fishery harvest strategy and protected species management strategy have not been updated since the phase out of the gillnet fishery. These major changes to gillnet fishing, which constitutes the main harvest method in the fishery, have led to the fishery not currently operating under a harvest strategy.

In addition, the Queensland Coral Fishery is not currently managed under an effective harvest strategy due to changes to the management of the fishery in 2022, including restrictions on the commercial take of CITES listed species, species-specific quota reporting and a revised Ecological Risk Assessment. Harvest strategies for components of the trawl fishery are also not fit for purpose due

to a change in target species in the southern inshore region due to the closure of scallop fishing in the region.

Recommendations:

23. The Queensland Government revise the East Coast Inshore, Trawl and Coral fishery harvest strategies to ensure they reflect current target species and include decision rules that meet the targets of the Sustainable Fisheries Strategy 2017-2027.
24. The Queensland Government ensure that all fish stocks are managed to a Maximum Economic Yield of at least 60% of unfished biomass.

Queensland Coral Harvest Fishery

2022 Reactive Monitoring Report recommendation (s)	**Recommendation O10:** Undertake a comprehensive review of current coral harvesting practices (given the escalation of this activity in recent years) to appropriately assess the extent and sustainability of this fishery in order to identify and implement appropriate fishery management measures and restrictions, where required.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	
2025 WHC 47 COM adopted decision	

To date there has been no comprehensive review of current coral harvesting practices since the publication of the mission report. Given the very poor outlook for the Great Barrier Reef and the increasing frequency and severity of climate-induced disturbance events, in particular mass coral bleaching, we consider a wild harvest coral fishery to be incompatible with the conservation goals of a World Heritage property.

The corals that provide the structural habitat for thousands of species contribute substantially to the Outstanding Universal Value of the Great Barrier Reef. However, these corals and the broader ecosystem are under significant threat from escalating disturbances, especially climate change.

It is within this context that the Queensland Coral Fishery operates. The fishery is permitted to harvest up to 190t of live coral per year almost exclusively from the World Heritage property. Fishing effort occurs with very high spatial overlap with mass bleaching events, with the very same coral species affected by bleaching and mortality, targeted for harvest. Ongoing harvest of healthy specimens of these species may be affecting the population viability, natural adaptation and resilience of the species to withstand major disturbance events.

At present harvest limits are based on historical catches and there is insufficient biological data and monitoring to effectively assess the sustainability of coral harvesting. Sampling to date indicates that fishing pressure has reduced the abundance and biomass of some key target species leading to localised depletion. In order to demonstrate the sustainability of harvest limits, significant and ongoing research effort would be required to ascertain the distribution and biomass of targeted species in the context of a rapidly changing ecosystem.

Aquaculture of corals provides a viable alternative to wild harvest that would provide increased protection for Great Barrier Reef corals, particularly for those species that are naturally rare and endemic and are highly sought after by the Queensland Coral Fishery.

The Reactive Monitoring Mission Report recommended that the State Party deliver *"Recommendation O10: Undertake a comprehensive review of current coral harvesting practices (given the escalation of this activity in recent years) to appropriately assess the extent and sustainability of this fishery in order to identify and implement appropriate fishery management measures and restrictions, where required.".* However, given the increasing frequency and severity of disturbance events leading to unprecedented coral mortality, a more urgent and ambitious response is needed to build resilience of the property.

The SoC report also notes that the Queensland Coral Fishery is a highly regulated fishery that operates under a harvest strategy, however, as noted above, the harvest strategy for the fishery is significantly out of date following reforms to the fishery in 2022. The harvest strategy decision rules do not reflect current management and as such do not constrain fishing. In practice the fishery is not operating under an effective current harvest strategy[85].

We also note that two operators have been granted captive breeding permits in order to legally export fully aqua-cultured corals. While this is a positive development, it should be noted that both operators are licensed commercial fishers that to the best of our knowledge remain active participants in the wild harvest fishery.

We recommend that Great Barrier Reef corals be given the utmost protection from all local drivers of mortality and the Australian government supports the Queensland Coral Fishery to rapidly transition from its major reliance on wild harvest to tank grown coral aquaculture by December 2028.

See Attachment B for a comprehensive briefing on the Queensland Coral Fishery authored by AMCS and Professor Morgan Pratchett of James Cook University.

Recommendation:

25. The Australian and Queensland Governments support the Queensland Coral Fishery to transition from wild harvest within the property to aquaculture production by December 2028.

Bycatch Reduction Devices

2022 Reactive Monitoring Report recommendation (s)	**Recommendation O8:** Advance research into effective bycatch reduction devices (BRDs) and accelerate the adoption and proactive installation of devices across relevant fisheries, including the production of associated regulatory requirements to ensure the adoption is legislated.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	
2025 WHC 47 COM adopted decision	

Implementation of this recommendation is continuing to progress. Fisheries Research and Development Corporation Project 2023-009[86] is currently trialling bycatch reduction devices (BRDs) with the aim of reducing interactions with sea snakes and small elasmobranchs in the trawl fishery. Initial results are positive with at sea trials reducing the catch of sea snakes by approximately 20-65% dependent on placement within the net. Final results are anticipated in 2026. Should final results confirm the efficacy of new BRDs, it is essential that these are mandated in the trawl fishery and replace inferior BRDs currently in operation.

Recommendation:

26. The Queensland Government mandates the use of Effective BRDs within the trawl fishery by June 2027 to reduce the capture of TEPS.

Protected Species Management Strategies

2022 Reactive Monitoring Report recommendation (s)	**Recommendation O9:** Finalize and implement protected species management strategies for all formally recognized protected species (or suites of protected species in particular biomes), which should include appropriate regulations to effectively prohibit catch or harvest of these protected species.
May 2023 Letter from Australian Environment Minister to UNESCO: commitments made	
2025 WHC 47 COM adopted decision	

No progress has been made against this recommendation in the last 12 months. The Protected Species Management Strategy (PSMS) for the East Coast Inshore (gillnet) Fishery is not currently fit for purpose, nor actively reviewed, despite the introduction of Electronic Monitoring Systems in the NX fishery. Urgent updates are required to introduce science-based trigger limits for threatened species mortalities. If these are breached, spatial closures should be enacted for a biologically relevant period of time to allow populations of threatened species to recover. These trigger limits are urgently required to ensure the cumulative impacts of bycatch across a fleet of fishers do not have population level impacts on threatened species.

There has been no further progress regarding a PSMS for the trawl fishery. However, progress in bycatch reduction trials and the rollout of independent monitoring should support an effective PSMS.

3. Current State of the Great Barrier Reef

3.1 Impacts of the 2023-24 coral bleaching and other extreme weather events

This section of the SOC report faithfully transcribes the Executive Summary of the 2024-25 Long Term Monitoring Program (LTMP) annual report by the Australian Institute of Marine Science. The report describes the impact of the 2024 severe mass coral bleaching event. The event had the largest spatial footprint ever recorded on the Reef and resulted in substantial coral mortality.

A widespread coral bleaching event occurred again in early 2025, this time in the northern half of the Reef (the Far Northern and Northern regions).[87] This event was the sixth since 2016 and the second back-to-back coral bleaching event since 2016–2017. The impact of this event will be published by AIMS in August this year as part of the annual LTMP report. We note that the 47th session of the World Heritage Committee did not request a report on the coral bleaching event of early 2025.

At the time of writing (mid-February 2026), the Great Barrier Reef has not yet experienced a mass coral bleaching event during the summer of 2025-26, however, the NOAA Coral Reef Watch program projects that:

- the Far Northern quarter of the GBR will experience Alert Level 2 (over 8 Degree Heating Weeks) in 1-4 weeks.
- the Northern quarter will experience Alert Level 2 in 5-8 weeks; and
- the Central and Southern half of the GBR will experience Alert Level 1 (between 4-8 Degree Heating Weeks) in 1-4 weeks

So far this summer, the greatest impact has been from extreme weather. In January this year, Cyclone Koji passed across the Reef, making landfall as a Category 1. The weather event cooled sea temperatures somewhat but resulted in heavy rainfall in the Wet Tropics, Mackay–Whitsunday and Fitzroy catchments. Some rainfall stations recorded more than 300 mm, with parts of the Mackay–Whitsunday region receiving over half a metre of rain from this event.

An email update from the Great Barrier Reef Marine Park Authority (29 January 2026) stated that the high rainfall during January led to flood plumes in the Northern, Central and Southern regions of the Reef. On the 23 January 2026, satellite imagery showed a flood plume 40 kms offshore of the Fitzroy River. Flood plumes increase pressure on inshore marine ecosystems by delivering large volumes of freshwater, sediment and nitrogen.

3.1.1 Observed Impacts

This section of the government's SoC report again faithfully transcribes more detail from the AIMS LTMP report of 2024/25. However, the major gap in the SOC report is the lack of a section on Projected Impacts.

GBRMPA and other Commonwealth agencies are well aware of possible futures for the Great Barrier Reef. In October, the Reef Authority held a forum with key stakeholders which explored various climate futures and the tools that the Authority has at its disposal to respond to these. The futures considered were:

1. Warming reaches 1.3˚C by 2035, stabilising by 2100.
2. Warming reaches 1.5˚C by 2035, reaching 1.8˚C by 2100.
3. Warming reaches 2˚C by 2035, reaching 2.7˚C by 2100.

Of the three scenarios, the tragedy for the world's coral reefs is that the first is no longer possible. Regarding the second scenario, it is very likely that 1.5°C will be reached in the early 2030s, but it is still very much possible to reach peak warming of 1.7°C by mid-century and decline to well below 1.5°C before 2100. It is unfortunate that this scenario, as discussed in the Climate Analytics report, Rescuing 1.5˚C, was not considered, however, it is still very useful to look at the 1.8°C by 2100 scenario as it does provide a likely future.

The third scenario is very similar to UNEP Emissions Gap Report 2025 which found that global warming projections over this century, based on full implementation of Nationally Determined Contributions (NDCs), are now 2.3 - 2.5°C, while those based on current policies are 2.8°C.

In its report about the Reef Forum, the Reef Authority described the cumulative effects of the above three scenarios. Below we present the description of the second and third scenarios on the Great Barrier Reef:

Scenario 2: ***Warming reaches 1.5˚C by 2035, reaching 1.8˚C by 2100.***
The combined effects of coral bleaching, cyclones, flooding and COTS have the following cumulative impacts on the Reef:

- Many coral reefs never fully regain pre-bleaching coral cover:
    - Some coral species decline.
    - Some coral reefs shift to heat and stress tolerant corals (encrusting, massive corals).
    - Some coral reefs shift toward algal dominance and macroalgae beds.
    - Coral loss over wide areas limits coral larval supply and has the potential for habitat fragmentation
- A reduction in fish habitat and loss of coral-dependent fish species, reduction in number of larger predatory fish.
- Seabirds dependent on fish prey reduce breeding success.
- Herbivorous fish dominate but are unable to keep pace with the rate of algae growth, especially on inshore reefs so turf algae dominate recruitment spaces.
- Combined stressors (marine heatwaves, runoff, storm) cause regional seagrass die-offs.
    - Dugong and turtle populations decline due to loss of feeding grounds.
- Some seagrass and mangrove habitats retreat due to temperature and coastal pressures, reducing fish nursery habitats and coastal protection.

Scenario 3: ***Warming reaches 2˚C by 2035, reaching 2.7˚C by 2100.***
The combined effects of coral bleaching, cyclones, flooding and COTS have the following cumulative impacts on the Reef:

- Coral recovery stops and coral reefs shift toward algal dominance:
    - Some heat and stress tolerant corals persist (encrusting, massive corals), significant loss of habitat building corals (branching, plate corals).
    - Coral loss over wide areas causes habitat fragmentation.
- Reduction in fish habitat cascades through the food web. Coral-dependent fishes decline first, followed by larger predators.
- Seabirds dependent on fish prey reduce breeding success.
- Herbivorous fish dominate but are unable to keep pace with the rate of algae growth.
- Combined stressors (marine heatwaves, runoff, storm) cause regional seagrass die-offs.
    - Dugong and turtle populations decline due to loss of feeding grounds.
- Some seagrass and mangrove habitats retreat due to temperature and coastal pressures, reducing fish nursery habitats and coastal protection.
- Extreme weather events erode coastal mangrove stands, reducing fish nursery habitats and coastal protection.
- Restoration efforts overwhelmed by repeated disturbance.

As discussed on section 2.1.1, Australia is not on track to limit emissions by 1.5°C by 2035. Australia's 2035 target is consistent with limiting emissions to 2°C+, more consistent with Scenario 3.[88]

4. Other Current Conservation Issues

While Chapter 4 identifies some current conservation issues that are having an impact, or may have an impact, on the property's Outstanding Universal Value, it does not provide any substantive

information about the many other significant threats that are identified in the GBR 2024 Outlook Report.

The Outlook Report provides a list of 46 threats[89], all but one of which are impacting the values of the GBR now[90]. Many of these 46 threats are addressed in the SoC report and elsewhere in this critique under the broad umbrella-terms of 'climate change', 'water quality' or 'unsustainable fishing activities'. However, examples of significant threats that have not been addressed elsewhere include:

- **Ocean acidification** – the 2025 GBR Outlook Report finds that the risk of ocean acidification to the Reef is Very High. "The ocean pH of Reef waters is decreasing and projections indicate this will almost certainly continue. Even relatively small changes in ocean pH reduces the capacity of corals and other calcifying organisms to build skeletons and shells, which in turn reduce their capacity to create habitat."[91] Ocean acidification has been described as "a silent killer".

- **Damage to the sea floor from large ships –** large ships transiting the shallow inner route of the GBR have been shown to resuspend sediments that reduce water quality and impact surrounding seagrass meadows and coral reefs.[92] Similarly, the long-term anchoring by large ships adjacent to major ports is also causing significant, localized physical damage to the seafloor.[93] Heavy anchors and chains repeatedly stir up seabed sediments, which then impact adjacent habitats.

- **Sea dumping of maintenance dredge spoil** – as shown in the GBR Outlook Report[94], sea dumping is happening adjacent to various ports, including substantial amounts of spoil being sea-dumped annually at three ports (Cairns, Townsville, and Gladstone). In at least one of those locations (Townville Port), the impacts upon OUV for the adjacent areas of Magnetic Island have been shown to be significant.[95,96]

- **Reclamation and alienation of World Heritage waters** – at various places along the GBR coast, capital dredge spoil has been used to develop port reclamations, effectively turning public World Heritage waters into private port lands. This has primarily occurred within Townsville Port and Gladstone Ports, but it has also occurred in other GBR coastal locations e.g. Airlie Beach marina. The total extent of reclaimed waters within the GBRWHA is ~ 8-10km^2. The aerial extent may be considered minor when compared to the overall size of the property, but the wider implications are of concern (e.g. relocating the WH boundary; alienating public lands/waters; the impacts on OUV; the precedent this sets for other State Parties).

4.1 Managing Cumulative Impacts

This section does little other than state there is a *'Cumulative impact management policy',* published in 2018. While that policy is a reasonable first step in defining key terms, it lacks the necessary guidance to effectively help decision-makers assess multiple threats "…including those from past, present and reasonably foreseeable future pressures".[97]

The SoC does not provide any update on how the Australian government is effectively managing cumulative impacts. Climate change, undeniably the most significant threat to the values of the GBR, is rarely if ever considered when assessing cumulative impacts and is not effectively considered in

any permit decisions for the GBR. This is particularly concerning when it comes to assessing the large coastal development proposals occurring along the GBR coast.

This section refers to *"…a comprehensive suite of programs provides hands-on actions … responding to incidents such as coral bleaching, cyclones, and marine strandings…*". Despite having potential tools in the management toolkit such as 'Special Management Areas', the only management agency response to coral bleaching so far has been to conduct in-water surveys, however, the recently held Reef Forum might result in a greater use of tools.

Australia has the potential to be far more effective in "*…[reducing] pressures within its control "*both within the marine park and in the adjacent catchment areas. For example, the marine park management authority could introduce and enforce broad-scale measures such as restrictions on use (e.g. fisheries closures) in areas that had been impacted by climate change, and there could be more effective compliance of the rules and regulations of many land-based activities in catchments. These actions together would go a long way to *"… support the long-term protection and resilience of the Reef".*

5. Potential Development Activities

Within UNESCO and IUCN, the relevant offices have limited resources to consider the diverse range of World Heritage properties with which they are dealing; they are therefore unable to carefully evaluate all that is provided by Australia in the current quarterly reports nor the implications for OUV.

It is recommended that more effective and brief quarterly assessments to UNESCO provide a more accurate assessment of the likelihood and consequence of all activities reported, with a specific focus on the consequences for OUV (perhaps using the risk matrix approach used in the GBR Outlook Reports).

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that the targets are consistent with the goals of the Paris Agreement nor that these be consistent, more specifically, with limiting warming to 1.5°C.

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[13] Climate Resource (2023), Updated assessment of Australia's emission reduction targets and 1.5°C pathways, p3. https://www.climate-resource.com/reports/wwf/20230612_WWF-Aus-Targets.pdf. These figures have allowed Australia to have a 0.97% share of the remaining global budget - well above our 0.33% share of global population. With that tighter constraint, the country's emissions budget would already have been exhausted.

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