



AUSTRALIA

SUBMISSION

SEPTEMBER 2024

Copyright Credit © Tanushee Rao/Unsplash

WWF-AUSTRALIA SUBMISSION ON AUSTRALIA'S DRAFT SUSTAINABLE OCEAN PLAN

The World Wide Fund for Nature-Australia (WWF-Australia) welcomes the opportunity to provide a submission to the public consultation on Australia's first draft Sustainable Ocean Plan. WWF-Australia is part of the WWF International Network, the world's largest independent conservation organisation. WWF's global mission is to 'stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature'. WWF-Australia has approximately two million financial and non-financial supporters.

WWF-Australia has a long-standing involvement and track record in sustainable oceans management; blue economy development; conservation efforts to support nature positive and climate resilient communities and ecosystems; and legislative and policy development to support healthy oceans and species.

WWF has an international network of more than 550 marine conservation and fisheries experts, spread across 60 WWF offices around the world. The WWF network has been heavily involved in advising and supporting the High Level Panel for a Sustainable Ocean Economy and development of sustainable ocean planning processes.

GENERAL COMMENTS

The perception that our oceans are immune to human pressures has been proven a myth. In recent years, it has become increasingly stark that multiple and cumulative threats are severely impacting our oceans – and people's livelihoods as well as marine life. These include global warming, overfishing, industrial coastal

RECOMMENDATIONS

1. Lift the level of ambition overall and harness the opportunity to develop a world-class, agenda setting Sustainable Ocean Plan.
2. For each national priority, clearly define the most significant problems and/or threats, and accompany these with priority actions that are SMART (specific, measurable, achievable, realistic and timebound) and accompanied by clear accountabilities.
3. Clearly articulate the role of the Sustainable Oceans Plan in meeting Australia's *Global Biodiversity Framework* obligations, particularly protecting and restoring at least 30% of our oceans by 2030.
4. Ensure Australia's priority actions are aligned with existing Ocean Panel commitments – including ambitious climate action targets aligned with pursuing efforts to limit global temperature increase to 1.5°C.
5. The Sustainable Ocean Plan fails to detail how Australia could become a regional and global leader in ocean conservation. We urge further work to develop this agenda, drawing on WWF-Australia's *Blueprint for Oceans Leadership*.

developments, and pollution. Scientists confirmed that in 2023/24, coral bleaching occurred in at least 62 countries and territories worldwide; this year's mass bleaching event will likely constitute the worst ever of its kind.¹ Globally, nearly 1,500 marine species are listed as being at risk of extinction,² and in Australia, more than half our shallow reef species have declined in numbers over the past decade alone.³ If we can't halt and reverse unsustainable demands on our oceans, then Australia's long-term well-being and prosperity are threatened, and populations across the Blue Pacific Continent (Oceania) face genuine existential threats.⁴

Oceans are central to the stories of First Nations and many Australian communities, to our national identity, and to our international reputation. Historically, Australia has been a global leader in oceans conservation. Australia established one of the world's first marine protected areas (MPAs) in 1879;⁵ was one of the original signatories to the *Antarctic Treaty*; and was a pioneer in establishing marine park and World Heritage protection for the Great Barrier and Ningaloo reefs. Recent decisions such as permanently phasing out commercial gill-net fishing from the Great Barrier Reef Marine Park and the strong MPA protection for Macquarie Island have been world-class and resonated strongly with Australians. The Australian Government has also joined several important high-level initiatives on biodiversity and oceans protection.⁶

Over the last decade, however, Australia's overarching approach to oceans conservation has become less visionary and impactful. Our global standing has diminished at the same time as oceans conservation has come increasingly prominent and more urgently needed.

To regain Australia's track record as a true world leader in oceans protection, concerted action across a range of areas is greatly needed. Australia's first Sustainable Ocean Plan (SOP) has the potential to act as an important step towards this goal and to fulfill Australia's commitments as a member of the High Level Panel for a Sustainable Ocean Economy (Ocean Panel). WWF-Australia appreciates the work undertaken and the wide consultation that has informed development of the SOP. We support the articulation of a 'sustainable ocean economy' and selection of national priorities set out in the draft SOP; we believe these provide an excellent foundation for the Plan.

However, we note that significant work is needed to ensure the SOP sets a clear agenda, with timelines and accountabilities, to ensure the SOP is a genuine plan. The 2021 *State of the Environment* report stated that 'policy guidance for management of specific pressures [on marine environments] is largely ad hoc and by sector, or absent';⁷ WWF-Australia believes the SOP provides an excellent opportunity to meet this deficiency. There is also a need to ensure alignment between our national priorities in the SOP and priority actions set out and endorsed by the Ocean Panel. For example, the SOP does not align with the Ocean Panel's priority action of 'establish and implement ambitious emissions reductions, covering all sectors, consistent with the *Paris Agreement* goal of pursuing efforts to limit global temperature increases to 1.5C' (see climate section below); nor does it articulate a plan to 'halt the net loss...of coastal and marine ecosystems' (see protect and restore section below).

¹ G. Dickie, 'Exclusive: World on brink of fourth mass coral reef bleaching event, NOAA says', *Reuters* (5 March 2024).

² W. Appeltans et al., 'Biodiversity knowledge and threats on marine life: Assessing no-take zones as a refuge for marine species' in *State of the Oceans Report* (UNESCO, 2024).

³ G.J. Edgar et al., 'Continent-wide declines in shallow reef life over a decade of ocean warming', *Nature*, 615 (2023), 858–865, <https://doi.org/10.1038/s41586-023-05833-y>

⁴ 'Blue Pacific Continent' and 'Oceania' are used interchangeably throughout this document, to describe the geographical region including Australasia, Melanesia and Polynesia, as well as our shared cultural identity and stories.

⁵ In the marine area of Sydney's Royal National Park; see J. Fitzsimons & G. Westcott, 'Large-scale expansion of marine protected area networks: Lessons from Australia', *Parks*, 24/2 (November 2018).

⁶ Including the High-Level Panel for a Sustainable Ocean Economy; the Leaders' Pledge for Nature; negotiations towards a future multilateral environmental agreement to end plastic pollution; the *Biodiversity Beyond National Jurisdiction* treaty; the *Kunming-Montreal Global Biodiversity Framework*; and the *WTO Agreement on Fisheries Subsidies*; among others.

⁷ R. Trebilco et al., 'Marine: Key findings' in *Australia State of the environment 2021*, (Australian Government Department of Agriculture, Water and the Environment, Canberra), <https://soe.dcceew.gov.au/marine/key-findings>, <https://doi.org/10.26194/nvaa-rf92>

In its current form the SOP is a collation of existing work and possibilities – it is neither a plan nor an action agenda. In some important respects, it represents a backward step when compared to commitments already made in the Ocean Panel's *Transformations for a Sustainable Ocean Economy* call to action.⁸ The 'summary of opportunities for collective national action' section under each of the national vision components do not provide any commitments, ensure any accountability, or provide an indication of when (or indeed whether) any of these actions will be taken. WWF-Australia believes the SOP cannot, in its current form, ensure or even effectively work towards a sustainable ocean economy. Without significant improvement, the SOP will not help to effectively conserve and restore our oceans to safeguard health and resilience, nor will it ensure sustainable production and growth of ocean industries. When it comes to current and expected damage to ocean ecosystems and oceans health from climate change, the draft SOP is a plan to fail whilst measuring ocean health decline.

A major and overarching concern is that without significant climate action from the Australian Government now, there is very little time to turn the current trajectory around before significant climate damage to Australia's oceans occurs that cannot be repaired. We recognise that the SOP is focused on oceans and will not be a major driver of climate and energy policy. However, noting leaders' commitments set out by the Ocean Panel, we strongly believe the SOP provides an opportunity for the Australian Government to adjust its course, starting with a science-based assessment of climate action necessary to protect our oceans. We are also concerned that the SOP in its current form **lacks any sense of urgency**; this represents a departure from the Ocean Panel's focus on the need for urgent and specific actions across five key areas for transformation.⁹

This submission addresses each of the proposed national priorities set out in the draft SOP, and provides specific recommendations for either strengthening these, and/or **specific recommendations which WWF-Australia believes should be included in Australia's SOP.** We note that the national priorities have not been numbered in the SOP and we support that approach, but we have numbered these in our submission for ease of reference.

PRIORITY ONE: CLIMATE ACTION

The *Paris Agreement* 1.5°C temperature limit is a critical threshold for the safety and wellbeing of all Australians and for Australia's world-famous ocean wonders, such as the Great Barrier Reef. As a member of the Ocean Panel, Prime Minister Albanese – along with the 17 other Ocean Panel members – have committed to and called on all governments internationally to 'establish and implement ambitious emissions reduction targets, covering all sectors, consistent with the *Paris Agreement* goal of pursuing efforts to limit global temperature increase to 1.5°C'.¹⁰ The draft SOP highlights Australia's climate targets which are aligned with 2°C of global average warming; this is not consistent with the high level of ambition under the *Paris Agreement* and Ocean Panel commitments, and is a temperature at which most investments in oceans conservation efforts will be severely compromised, or in the case of coral reefs, ineffective.

Whilst we acknowledge the SOP is not the mechanism where Australia's climate mitigation ambition policies are developed, the SOP should set out the climate science on why limiting global temperature increase to 1.5°C above pre-industrial levels is absolutely critical for the health of Australia's oceans. It should then identify opportunities to prosecute the critical importance of cross-government policy aligned with that temperature limit across all government departments, with a first order priority of influencing the upcoming decision on the 2035 Nationally Determined Contribution under the *Paris Agreement* due to the UN Framework Convention on Climate Change by 10 February 2025.¹¹ The SOP should galvanise cross-departmental collaboration across all

⁸ High Level Panel for a Sustainable Ocean Economy, *Transformations for a Sustainable Ocean Economy: A Vision for Protection, Production and Prosperity* (2023).

⁹ High Level Panel for a Sustainable Ocean Economy, *Transformations for a Sustainable Ocean Economy*.

¹⁰ Ocean Panel, *Transformations for a Sustainable Ocean Economy*, 11.

¹¹ United Nations Climate Change Secretariat, Report on the 11th meeting of the Paris Agreement Implementation and Compliance Committee, Document PA/ICC/2024/M11/4, 17-19th April, Paragraph 19.

National Priorities, particularly on climate action. To have a meaningful impact on the sustainability of Australia's oceans, ultimately, the 'final' SOP¹² needs to reflect that the Australian Government has a plan to achieve/implement government policy that is aligned with the 1.5°C critical temperature limit.

Emissions Reduction Targets:

Australia's obligations under the *Paris Agreement* require that in setting our climate targets we take account of the best available science and ensure our climate targets represent Australia's common but differentiated responsibilities and respective capabilities, and highest possible ambition.¹³ Some progress has been made in Australia to lift our ambition to reduce carbon emissions in recent years. However, Australia's current emission reduction targets are still not sufficient. They are currently aligned with a global temperature rise of 2°C – a climate scenario in which significant harm to oceans would occur. The starkest of these is that almost all coral reefs globally would be lost. Australia and the world have only six years left to 2030, to turn the tide on emissions and ocean health decline.¹⁴ The 2023 United Nations Environment Programme *Emissions Gap Report* found that 'failure to bring global GHG emissions in 2030 below the levels implied by current NDCs will make it impossible to limit warming to 1.5°C with no or limited overshoot and strongly increase the challenge of limiting warming to 2°C'.¹⁵

Australia's must overshoot the current 2030 target of 43% below 2005 levels by 2030. It is well below Australia doing its part to pursue efforts to limit warming to 1.5°C and aligned with 2°C of warming, which would mean we lose Australia's coral reefs.¹⁶ To give coral reefs and other ocean ecosystems a fighting chance and to improve ocean health, the best available science shows that Australia must also set a 2035 NDC of at least 90% below 2005 levels and net zero before 2040.¹⁷

Fossil fuels: The draft SOP is silent on Australia's major contribution to global warming as the world's third largest exporter of fossil fuels. There is no pathway for Australia to make any defensible claims of oceans leadership without actively addressing the climate science and making a major course correction to drive down our in-country and exported emissions before 2030. If Australia doesn't take the opportunity to urgently address that, climate science emissions trajectory pathways predict by 2030 will be too late for most aspects of oceans health. That is because significant and ongoing climate damage will be locked in and stabilising global temperatures to the critical temperature limit for oceans health of 1.5°C will no longer be possible.¹⁸ Continued and expanded fossil fuel development is inconsistent with Australia's obligations under the *Paris Agreement* to pursue efforts to limit global warming to 1.5°C above pre-industrial levels.¹⁹ The climate science is clear that Australia's continued support for fossil fuel extraction is incompatible with stabilising warming at 1.5°C and therefore will cause more harm to all communities that depend on healthy coral reefs for their livelihoods and food security.²⁰

Carbon Capture and Storage (CCS): There are numerous mentions of CCS in the draft SOP, as one of five 'solutions to achieve Australia's net zero target'. WWF's position is that CCS should not be used to prolong

¹² Noting that sustainable oceans planning should be an iterative process.

¹³ See the *Paris Agreement*, Article 4(3).

¹⁴ United Nations Environment Programme (2023). Emissions Gap Report 2023: Broken Record: Broken Record – Temperatures hit new highs, yet world fails to cut emissions (again). Nairobi. <https://doi.org/10.59117/20.500.11822/43922>, page XVI.

¹⁵ UNEP, Emissions Gap Report 2023, page XVI.

¹⁶ M. Meinshausen, M. and Z. Nicholls, Updated assessment of Australia's emission reduction targets and 1.5°C pathways. Independent expert report commissioned by WWF-Australia. (2023).

¹⁷ M. Meinshausen, M. and Z. Nicholls, 'Updated assessment of Australia's emission reduction targets'.

¹⁸ UNEP, Emissions Gap Report 2023, page XVI.

¹⁹ Trout et al., May 2022, Environmental Research Letter "Existing fossil fuel extraction would warm the world beyond 1.5°C", <https://iopscience.iop.org/article/10.1088/1748-9326/ac6228/meta>; and Welsby et al, 2021, Nature "Unextractable fossil fuels in a 1.5°C world" available online at <https://www.nature.com/articles/s41586-021-03821-8>.

²⁰ H. Lee & J. Romero, eds., 'Projected CO2 emissions from existing fossil fuel infrastructure without additional abatement would exceed the remaining carbon budget for 1.5°C (50%) (high confidence)' in *Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* (Geneva: IPCC, 2023) 19:B.5; K. Trout et al., 'Existing fossil fuel extraction would warm the world beyond 1.5°C', *Environmental Research Letters* (2022); D. Welsby et al., 'Unextractable fossil fuels in a 1.5°C world', *Nature* (2021).

fossil fuel production and is against all use of CCS to mitigate fossil fuels. Absolute priority should be given to actual emissions reductions; CCS should not be considered unless significant knowledge gaps have been addressed and even then, only once all other reduction measures have been exhausted. This position is grounded in science, including research undertaken by co-chairs of the Ocean Panel's Expert Group which states that while CCS offers potential, there remain 'significant gaps in knowledge in terms of ability to scale'.²¹ The vast majority of CCS projects to date have failed²² and new research shows that estimates of CCS' potential to date have been vastly overestimated.²³ As noted by the Oceans Panel Expert Group, scaling CCS entails 'very real risks to ocean ecosystems', including leakage back into the marine environment, negative impacts on the health and function of marine organisms, ocean acidification and 'potentially serious impacts on little-understood deep-sea ecosystems'.²⁴

Recommendations:

1. The SOP must be amended to make a clear and unequivocal statement that a 1.5°C global temperature limit is a critical temperature threshold for Australia's oceans, particularly coral reefs, and use the SOP to drive an ambitious 1.5°C aligned climate mitigation agenda across government.
2. The SOP should help to drive climate action across the whole of government at a speed and scale commensurate with the 1.5°C critical temperature limit with a priority on Australia's upcoming 2035 National Determined Contribution decision due on the 10 February 2025, emphasising the importance to Australia's oceans of committing to a science-aligned NDC of at least 90% below 2005 levels by 2035 and net zero before 2040.²⁵
3. Acknowledge and support Pacific leaders' calls for a global Fossil Fuel Non-Proliferation Treaty and a just transition to a fossil fuel-free Pacific. This requires immediately ceasing the approvals of all fossil fuels and fossil fuel infrastructure; making a plan to phase out all fossil fuels early and before the end of their approval life; and replacing all fossil fuels for energy and export with clean energy and clean exports.
4. As an unproven technology with significant risks, any inclusion of CCS in the SOP should acknowledge knowledge gaps; feasibility limitations; and significant risks to ocean ecosystems and should rule out the use of CCS as a mechanism to prolong fossil fuel use by mitigating fossil fuel production. Sole priority should be given to actual emissions reductions measures.

PRIORITY TWO: FIRST NATIONS

In recent decades Australia's governments have started to integrate First Nations leadership into policymaking, management and caring for Country. While not a panacea for healing Country, these efforts are a critical stepping stone towards inclusive conservation;²⁶ they are also a recognised driver of *Closing the Gap* (Target 8 (employment) and Target 15B (legal rights/interests in the sea)).²⁷ Some important progress has been made, for example, through establishment of the Indigenous Protected Area (IPA) Program in 1997 and work to reconcile

²¹ O. Hoegh-Guldberg, et al., *The Ocean as a Solution to Climate Change: Five Opportunities for Action*, (Washington, DC: World Resources Institute, 2019).

²² A. Abdulla et al., 'Explaining successful and failed investments in USA carbon capture and storage using empirical and expert assessment', *Environmental Research Letters*, **16**/014036 (2020) <https://doi.org/10.1088/1748-9326/abd19e>

²³ Y. Zhang, C. Jackson & S. Krevor. 'The feasibility of reaching gigatonne scale CO₂ storage by mid-century', *Nature Communications*, **15**/6913 (2024), <https://doi.org/10.1038/s41467-024-51226-8>

²⁴ O. Hoegh-Guldberg, et al., *The Ocean as a Solution to Climate Change*.

²⁵ M. Meinhausen & Z. Nicholls, *Updated assessment of Australia's emission reduction targets and 1.5°C pathways* (Climate Resource for WWF-Australia, 2023).

²⁶ N.M. Dawson et al., 'Reviewing the science on 50 years of conservation: Knowledge production biases and lessons for practice', *Ambio*, **53** (2024), 1395–1413, <https://doi.org/10.1007/s13280-024-02049-w>

²⁷ Productivity Commission *Closing the Gap* dashboard, Socio-economic area 15: Aboriginal and Torres Strait Islander People maintain a distinctive cultural, physical and economic relationship with their land and waters (2024).

governance of marine protected areas (MPAs) with First Peoples' customary ownership of coastal and marine environments.²⁸

First Nations legal rights in marine areas have seen slower progress compared with land rights.²⁹ There are also worrying signs of efforts to undermine those rights. First Nations leadership in environmental protection litigation recently resulted in Federal Court orders that initially prevented Santos' planned drilling 7 km off the coast of the Tiwi Islands in 2022; then, in 2024, the court lifted the injunction, permitting drilling to proceed.³⁰ Santos subsequently took legal action to recover costs from environmental groups that were not parties to the case but had supported First Nations groups efforts to protect sea country.³¹ While Santos has discontinued the action for now, there are major concerns regarding the chilling effect of similar action in the future on First Nations environmental leadership, collaboration with environmental charities, and democratic participation more broadly.

With further regard to legal rights, First Nations have been largely excluded from the economic benefits generated from Sea Country. Where recognised, fishing rights have been for traditional catch only, thereby not allowing First Nations Groups to enjoy economic and employment benefits from Sea Country. Country that has been sustainably managed for millennia. With new economic opportunities emerging around blue economy and nature repair, there is a need to ensure that First Nations do not again miss out benefits that can financially support Indigenous families and communities, which can provide greater opportunity for economic self-determination.

Indigenous Protected Areas (IPAs) and Indigenous rangers are the foundation of effective and equitable nature conservation in Australia. While funding has been insecure, this work has benefited from bipartisan political support. Australia's IPA program has delivered demonstrable social, cultural, health and economic benefits, while forging more collaborative caring for Country.³² But barriers to inclusive conservation remain, including equitable and durable funding; job creation and gender equity in conservation roles; and legal reform to remedy a range of issues.

Scaling-up government investment in and cooperation on IPAs and conservation employment will not only deliver benefits to First Nations communities and all Australians. This work can play an important complementary role in meeting the 2030 and 2050 biodiversity goals agreed upon by the international community as part of the *Global Biodiversity Framework*. As countries take on the essential challenge of protecting 30 per cent of the world's oceans by 2030 (and more in the long term), 'other effective conservation measures' (commonly referred to as OECM and including indigenous protected areas) will be a crucial tool to achieve this. Australian First Nations leadership can help to pave the way towards these goals through capacity and knowledge sharing across our region and internationally.

Recommendations (see also related recommendations in the 'Equity and Inclusion' section):

1. Establish a Commissioner for Country as a voice to lead and support work to heal Country. The role should be Aboriginal and/or Torres Strait Islander identified, established in statute, appointed by the Minister for Environment and accompanied by an appropriately resourced office.

²⁸ P. Rist et al., 'Indigenous protected areas in Sea Country: Indigenous-driven collaborative marine protected areas in Australia', *Wiley*, (6 December 2018) <https://doi.org/10.1002/aqc.3052>

²⁹ Productivity Commission *Closing the Gap* dashboard.

³⁰ *Dennis Murphy Tipakalippa v National Offshore Petroleum Safety and Environmental Management Authority* (2022) 2 FCA 1121; *Munkara v Santos NA Barossa Pty Ltd* (2024) 3 FCA 9.

³¹ M. Slezak, 'Santos uses new tactic to fight climate change movement after traditional owners lose court challenge against Barossa gas project', *ABC* (30 June 2024).

³² J.K. Weir, C. Stacey & K. Youngetob, *Benefits of Caring for Country*, prepared for the Department of Sustainability, Environment, Water, Population and Communities by the Australian Institute of Aboriginal and Torres Strait Islander Studies (Canberra, June 2011).

2. Double the area of Sea Country Indigenous Protected Areas from 5.5 million hectares to 11 million hectares, with sustained and adequate funding allocated to management. A twinned employment strategy should seek to broaden the distribution of Indigenous ranger programs across Australia to care for expanded protected areas.
3. Commit to creating and employing 5,000 Indigenous ranger roles by 2030 and achieving gender equity by 2026. WWF-Australia welcomes Labor's commitment to create 3,800 roles by the end of the decade but advocates a more ambitious – but still realistic – goal.
4. Allocate \$10 million over three years to expand and operate an Indigenous women rangers' network, supporting women rangers' entry, retention and ability to excel in their field. The package must be comprehensive (i.e. fund more than salaries) and ensure culturally safe workplaces, female leadership, appropriate professional support and career pathway development.
5. Introduce legislation to define and prohibit strategic litigation against public participation lawsuits, to protect First Nations communities' ability to advocate on behalf of their communities and Sea Country and to protect the democratic freedoms of all Australians.
6. Support activities, both through funding and legislative change, to strengthen First Nations legal rights in Sea Country. This includes legal rights to activities that generate economic rents, including commercial fishing rights, blue carbon credits and nature repair.

PRIORITY THREE: PROTECT & RESTORE

The *Kunming-Montreal Global Biodiversity Framework* (GBF) represents one of the most significant commitments to date by the international community to halt and reverse biodiversity loss. Globally, 30x30 marine protection is widely recognised as **a minimum requirement to mitigate unacceptable levels of biodiversity loss**.³³ The scientific evidence base supports 30-70 per cent protection of land and sea internationally; 30-50 per cent of each habitat or ecosystem in each bioregion in areas like Australia;³⁴ and higher for particular areas such as turtle nesting beaches.³⁵ Some mega-biodiverse regions and countries – including Australia – will need to contribute more substantially to global 30x30 goals compared with others.

Australia's network of marine protected areas (MPAs) covers approximately four million km², constituting more than 40 per cent of Australia's exclusive economic zone (EEZ). However, less than a quarter of the total area covered by Commonwealth MPAs is highly protected and free from all extractive use.³⁶ This leaves swathes of vulnerable and precious ecosystems and habitats lacking in sufficient protection, risking further degradation and nature loss. This is critically important to achieving Australia's biodiversity commitments – it also has implications for the international community's commitments under the GBF, given that approximately 80 per cent of all marine species in Australian waters are found nowhere else on Earth.³⁷

Australia's coral reefs – the rainforests of the sea – are in real trouble. Coral reefs occur in less than one per cent of the ocean but home to around one-quarter of all marine species.³⁸ Between 16-20 per cent of the world's

³³ S. Woodley et al., 'A review of evidence for area-based conservation targets for the Post-2020 Global Biodiversity Framework', *Parks Journal*, 25/2 (2019), 19-30; B.C. O'Leary et al., 'Effective Coverage Targets for Ocean Protection', *Conservation Letters*, 9 (2016) 398-404.

³⁴ MRWG Science Advisory Panel, *How large should marine reserves be?* (2001).

³⁵ D. Beaver & G. Llewellyn, *Designing a comprehensive, adequate and representative (CAR) network of marine protected areas for Australia's Commonwealth Waters* (Sydney: WWF-Australia, 2009).

³⁶ Collaborative Australian Protected Areas Database (CAPAD) Commonwealth of Australia (Marine National, Version 2 2022); Commonwealth of Australia, *Environment Protection and Biodiversity Regulations 2000*; *Australian IUCN Reserve Management Principles for Commonwealth Marine Protected Areas* (2002).

³⁷ D. Beaver & G. Llewellyn, *Designing a Comprehensive, Adequate and Representative (CAR) Network of Marine Protected Areas for Australia's Commonwealth Waters: Progress Report*, (WWF, 2009).

³⁸ D. Souter et al., *Status of coral reefs of the world: 2020*. Global Coral Reef Monitoring Network, International Coral Reef Initiative, Australian Government and Australian Institute of Marine Science (2021).

coral reefs are in Australia,³⁹ including the world's largest reef complex (the Great Barrier Reef) and its longest fringing reef (Ningaloo Reef/Coastal Area). Collectively, they support an estimated tens of thousands of species of coral, fish and other marine organisms; as well as globally significant populations of marine turtles, dugongs, dolphins, whales, sharks and rays.⁴⁰

Marine mammals, sharks and turtles are key indicators of marine ecosystem health, and face multiple major hazards from fisheries bycatch to impacts of overfishing; ship strikes; chemical, plastic and underwater noise pollution; habitat loss, unsustainable use; illegal trade; irresponsible marine tourism, and climate change – right across their home ranges and migratory pathways, which for some species span thousands of kilometres per year.⁴¹ Halting and reversing growing risks will require a collaborative response from government, industry, researchers, communities and others.

Plastic pollution poses significant threats to Australia's wildlife. An estimated 15,000-20,000 turtles have been entangled in fishing gear in the northern Gulf region.⁴² Around half of all marine turtles have ingested plastic, and ingesting just one piece increases a turtle's chance of dying by 22 per cent.⁴³ More than two thirds of short-tailed shearwaters – Australia's most numerous seabird – have ingested plastic.⁴⁴ Many marine species are susceptible to injury, disease and death resulting from plastic pollution, with certain types of plastics known to be particularly deadly, and certain species more vulnerable than others.⁴⁵

While we welcome the 'opportunities for collective action' set out under the restore and protect priority, we note that actions to 'review', 'explore', and 'investigate' are actually precursors to action – not actions as such. We also note that the specific role of the SOP in relation to achieving Australia's GBF targets is unclear. Our understanding, derived from discussions with the Australian Government and as indicated in the *Draft National Roadmap* for 30 by 30 on land,⁴⁶ is that the SOP is a primary mechanism for detailing Australia's marine 30x30 commitments;⁴⁷ however the SOP states that it 'can help drive action' on GBF targets. Further work is needed to ensure the SOP specifies precise relationships with other plans and commitments and articulates the actions that will be undertaken to meet them.

Recommendations:

1. At least 30 per cent of Australia's EEZ should be fully protected (IUCN categories I/II), to meet our obligations to effectively conserve and manage high biodiversity areas, grounded in science and the comprehensive, adequate and representative (CAR) principles. Planning should incorporate conservation connectivity needs outside of Australia's EEZ.
2. Immediate priorities should be to (1) finalise the review of the South-east Marine Parks Management Plan; (2) fully implement management plans for Cocos (Keeling) and Macquarie Island; and (3) expand and upgrade protection for the Heard Island and McDonald Islands Marine Reserve.

³⁹ Resource Watch. *Coral Reefs Australia: Importance, status and outlook*. Accessed 12 March 2024:

<https://resourcewatch.org/dashboards/coral-reefs-australia>

⁴⁰ IUCN, Great Barrier Reef and Ningaloo Coasts Conservation Outlook Assessments (2020).

⁴¹ C. Johnson et al. *Protecting Blue Corridors - Challenges and solutions for migratory whales navigating national and international seas*. WWF International (2022), <https://doi.org/10.5281/zenodo.6196131>

⁴² Australian Government Commonwealth Scientific and Industrial Research Organisation, *Inquiry into the Threat of Marine Plastic Pollution in Australia and Australian Waters* (2015).

⁴³ C. Wilcox et al., 'A quantitative analysis linking sea turtle mortality and plastic debris ingestion', *Scientific Reports*, 8/12536 (2018).

⁴⁴ H. Acampora et al., 'Comparing plastic ingestion between juvenile and adult stranded Short-tailed Shearwaters (*Puffinus tenuirostris*) in Eastern Australia', *Marine Pollution Bulletin*, 78/1-2 (2013), <https://doi.org/10.1016/j.marpolbul.2013.11.009>

⁴⁵ L. Roman et al., 'Plastic pollution is killing marine megafauna, but how do we prioritize policies to reduce mortality?', *Conservation Letters*, (2021), <https://doi.org/10.1111/conl.12781>

⁴⁶ Commonwealth of Australia, *Achieving 30 by 30 on land: National Roadmap for protecting and conserving 30% of Australia's land by 2030* (Canberra: Commonwealth of Australia, 2024).

⁴⁷ Opportunities for strengthening marine protection, consistent with the 30 by 30 target, are being explored through the Sustainable Ocean Plan and the regular, 10-yearly reviews of Australian Marine Park Management Plans.

3. Commit to beginning the review of Australian marine parks in 2025 to expand and upgrade Lord Howe Island Marine Park, and Norfolk Island Coral Sea Marine Park.
4. Develop and implement a plan to restore at least 30% of degraded coastal areas to fulfil Australia's GBF obligations under Target 2, focusing on improved management and health of ponded pastures and tidal marsh ecosystems; re-establishment of degraded seagrass communities; and shellfish reef restoration.⁴⁸
5. Develop comprehensive financing to support expanded marine parks network, including integration of private sector investment and public/private financial partnerships.
6. Protect critical habitats and migration corridors key indicator species including whales, dolphins and turtles, including through increasing coverage of IUCN Important Marine Mammal Areas (IMMAs) within Australia's Marine Park Network, and through investment in research.
7. Undertake necessary reform to support Australia's transition to a circular economy, including for plastics. Prioritise consumption reduction and elimination of harmful chemicals and unnecessary single-use products (of all material types), focusing on those with the highest pollution risk.
8. Support a global moratorium on deep sea mining in recognition of the lack of knowledge regarding its impacts. Available evidence suggests deep seabed mining poses significant risks to the ocean, including causing irreversible harm to the marine environments and its ecosystem services or the extinction of entire species.

PRIORITY FOUR: INDUSTRY

This section focuses on offshore wind. Further recommendations regarding shipping and fisheries can be found in *WWF-Australia's Blueprint for Australian Oceans Leadership*, which will be shared with the SOP Task Force imminently.

WWF-Australia has made a submission to the Australian Government's Offshore Wind Industry Consultation Process; a full copy of our submission can be made available on request. Key points from that submission that are of particular relevance to the SOP are included below.

Offshore wind can contribute a major component of Australia's renewable energy transition and help to reach our net-zero targets. Australia has some of the best offshore wind resources in the world, with estimates of up to 2000 GW of capacity.⁴⁹ It is a critical opportunity to replace ageing fossil fuel plants and to drastically reduce greenhouse gas emissions. One of the key advantages of offshore wind is its ability to generate more energy than onshore wind without the need for as many turbine installations. Wind is also more consistent and stronger offshore than on land, generating energy for more hours of the day. A single offshore wind project can generate enough energy to power almost two million homes per year and can also be situated close to load centres such as industrial precincts.⁵⁰

Recommendations:

1. The Federal Government should continue to support the development of an offshore wind industry in Australia as a key climate solution.

⁴⁸ Wentworth Group of Concerned Scientists, *Blueprint to Repair Australia's landscapes: Actions & investment for a healthy, productive and resilient Australia in the next 30 years. Part II: Technical Review*, (Sydney 2024).

⁴⁹ Norton Rose Fulbright, 'Global offshore wind: Australia', (January 2024) <https://www.nortonrosefulbright.com/en/knowledge/publications/ec2a685f/global-offshore-wind-australia>, accessed 12 September 2024.

⁵⁰ Department of Climate Change, Energy, the Environment and Water, 'Building an offshore wind industry', <https://www.dccceew.gov.au/energy/renewable/offshore-wind/building-offshore-wind-industry#:~:text=Depending%20on%20the%20size%20of,million%20homes%20in%20a%20year>, accessed 12 September 2024; 'T. Christopher & M. Voyer, 'Australia needs large-scale energy production – here are 3 reasons why offshore wind is a good fit', The Conversation (June 21, 2024), <https://theconversation.com/australia-needs-large-scale-energy-production-here-are-3-reasons-why-offshore-wind-is-a-good-fit-232899>

2. A precautionary approach to offshore wind development with careful planning and mitigation measures in place is critical. This should prevent deployment of offshore renewables in current or planned marine protected and conserved areas, Indigenous sacred sites, and other areas of particular importance for biodiversity, ecosystems and services. These include ecological corridors, migration routes of marine species and birds, fish spawning and rearing areas, as well as areas with high natural carbon uptake and storage such as seagrasses, saltmarshes, mangroves, reefs and other areas critical for coastal protection and resilience. Any damage to or degradation of these areas will have greater impacts on ocean ecosystems and thus on stakeholders outside of the energy sector; this could also bring reputational risks and erode public support for renewables.
3. Thorough and robust marine spatial planning must be undertaken prior to the future declarations of offshore wind zones. Once a zone is declared, there is less opportunity to avoid environmental impacts.
4. Renewable energy developers and government bodies undertake significant environmental surveys ahead of gaining a feasibility license. It is critical that government facilitates the sharing of this data to ensure it contributes to broader marine knowledge and understanding of cumulative impacts of developments. Non-sensitive developer data should be shared freely to improve baseline information and monitoring of renewable energy project impacts. This will improve understanding of the sector's interactions with marine ecosystems and species, informing future MSP processes, scientific research and policy development.
5. Include and heavily weight non-price auction criteria (i.e. environmental and social criteria) in procurement and tendering processes to foster innovative solutions and advance best practices with the aim of avoiding impacts on marine ecosystems.
6. Federal and state governments should work to ensure regional planning is undertaken to maximise shared infrastructure (e.g. transmission lines) to reduce the overall footprint of development
7. The Federal Government should adhere to, and facilitate industry's adherence to, leading practice principles identified by the First Nations Clean Energy Network and to Free, Prior and Informed Consent rights. Effective stakeholder consultation can help facilitate local value creation, including in the form of job creation, potential co-ownership and other co-benefits.

PRIORITY FIVE: COLLABORATION

WWF-Australia welcomes the strong focus on collaboration within the draft Sustainable Oceans Plan. We strongly endorse and mirror the prioritisation to strengthen the representation and empowerment of First Nations people to be part of planning, decision-making and implementation, as detailed in Section 2. However, we note that many of the challenges and practical recommendations made during consultation are not reflected in the SOP. The opportunity to 'build on existing mechanisms and potentially establish new forums' to improve oceans governance is vague, and without any clear accountability for taking this work forward, it is difficult to see how this work would be advanced.

WWF-Australia notes the number of committees listed in the collaboration section and is aware of many more. We support proposals to build on these efforts. During development of the draft SOP, we noted that DCCEW utilised external consultants to help undertake the consultation. While this appeared to work well for that specific task, once the plan is finalised we strongly recommend that resources and capacity be invested into a dedicated secretariat to support ongoing long-term collaboration. We also note the reference to Ocean Decade Australia and the role that Ocean Decade plays in other countries through their national committees. We encourage the government to explore whether Ocean Decade may be the appropriate organisation to connect ocean stakeholders given this is their purpose in Australia and the global expertise they possess in this field.

WWF is concerned that the lack of a clear prioritisation or detailed action agenda in the draft SOP risks making future collaboration efforts ineffective. As stated in our introductory comments, at the heart of the SOP should

include a clear action agenda and strategies to build the short- and long-term conservation of our oceans. Without such prioritisation, the terms of reference for collaboration are likely to be broad and ill-defined. There are many risks to this approach, including an appearance of ‘consultation for consultation’s sake’ and an inability to identify key stakeholders with appropriate skills and expertise to engage with.

Lastly, WWF supports the language in this section that there is an opportunity for Australia to boost our international engagement in oceans issues. WWF is in the process of finalising a new publication – a *Blueprint for Australia’s Global Oceans Leadership* – in which we detail where we believe many of the opportunities lie. WWF has shared the draft Blueprint with DCCEW staff and we’d be delighted to engage further once the document is finalised.

Recommendations:

1. Consider establishment of a National Decade Committee (or similar) which could ‘facilitate the broad participation of national ocean communities in the UN Ocean Decade, and to connect national policies and stakeholder needs with the global momentum of the Decade’.⁵¹ Any committee needs to be charged with achieving the bold goals of an improved SOP, that includes clearly defined problems and/or threats, and accompany these with SMART priority actions (specific, measurable, achievable, realistic and timebound) and clear accountabilities.
2. Create an Australian Government Special Envoy for Oceans, appointed by the Prime Minister. The Envoy’s mandate should include (but not be limited to) elevating and progressing oceans diplomacy and action domestically and internationally, working closely with relevant ministers and across portfolios, and building population-wide oceans literacy.

PRIORITY SIX: EQUITY AND INCLUSION

Australians identify with and are incredibly invested in protecting our precious places, marine ecosystems, and the species that rely on them. An overwhelming 85% of Australians say it’s important for them to know nature in Australia is looked after; more than three quarters say nature is important to them for recreation, relaxation, and stress management.⁵² Research shows Australians are both contributing to nature protection in their daily lives and expect their governments to uphold their international obligations when it comes to biodiversity conservation and action on climate change.⁵³ WWF-Australia supports actions to enable meaningful engagement of diverse groups and communities in decisions regarding and the work of caring for our oceans. As such, we support the equity and inclusion outcome proposed in the SOP, and we emphasise the importance of integrating the First Nations perspective relating to communal stewardship, and shared custodianship of the Earth.

Positive ecological and social outcomes are strongly associated with higher levels of stewardship by Indigenous Peoples and local communities and their institutions.⁵⁴ Inclusive conservation is therefore both an ethical imperative, but also a driver of conservation effectiveness. Conservation efforts need to challenge and in many cases dismantle existing power structures, and support the participation and leadership, of all people who may otherwise be excluded or marginalised on the grounds of gender, sexuality or sexual characteristics, disability status, age, race, ethnicity or other social status. WWF-Australia strongly supports a shift towards community-based management and a regenerative economy for all, and we advocate alongside those people who live closest to the nature we seek to regenerate.

⁵¹ UNESCO-IOC (2023). Best Practice Manual for National Decade Committees. Paris, UNESCO. (The Ocean Decade Series, 43)

⁵² Biodiversity Council, *2024 Biodiversity Concerns Report: A survey of community attitudes to nature conservation*, (March 2024).

⁵³ Biodiversity Council, *2024 Biodiversity Concerns Report*.

⁵⁴ N.M. Dawson et al., ‘Reviewing the science on 50 years of conservation: Knowledge production biases and lessons for practice’.

Recommendations:

1. **First Nations employment:** Put in place necessary measures to provide Indigenous rangers with the opportunity to assume responsibilities for enforcement and compliance activities in their Sea Country and provide adequate resourcing and training to support this. At present, enforcement roles and remuneration are not equitable.
2. Further specific actions should be set out with regard to First Nations' leadership, economic self-determination and employment in caring for Sea Country – either in this section, or under the First Nations priority. We have articulated a suite of recommendations above covering this and other equity recommendations in the First Nations section above.
3. **Youth inclusion:** We support the youth engagement opportunity outlined, noting that youth advisory groups would be preferable to forums, and should have clear entry points into policy discussions and tangible impact on decisions. These should be accessible and representative advisory boards that consider the **voices/perspectives of young people living in regional, rural and remote areas**. We would be particularly supportive of practical programs that support young people to learn about, engage with and develop leadership skills in ocean and coastal management and conservation.
4. **Equity across the Blue Pacific Continent:** Ensuring future policies are inclusive and consider those most vulnerable to climate change is listed as an 'opportunity'; in our view, this should be a non-negotiable commitment. We urge consideration of the breadth of calls contained within the Oceania First Voices Regional Forum, including the call to governments across the region to 'support the call for a just transition towards a fossil fuel free Pacific and world in line with the goals and targets of the Paris Agreement and keeping 1.5 alive'.⁵⁵
5. **Inclusive governance:** WWF-Australia acknowledges efforts undertaken throughout SOP consultation in this regard but notes there is no clear mechanism for ongoing engagement and input into policy decisions from a range of stakeholders, including First Nations people, women, youth, people in disadvantaged situations and local coastal communities. A National Decade Committee could assist in ensuring diversity of representation as well as nurturing institutional knowledge; a Commissioner for Country (recommended above) would make a strong contribution to inclusive oceans governance.

PRIORITY SEVEN: KNOWLEDGE

As the Sustainable Ocean Plan notes, comprehensive, accessible and inclusive ocean ecosystem knowledge is essential to sustainably managing 100% of Australia's EEZ, and particularly to planning and delivering effective conservation strategies. The importance of continuing to embark on knowledge acquisition cannot be overstated. We are pleased that the draft SOP acknowledges many knowledge gaps, as well as the need to scale up applied research on ocean ecosystems; increase First Nations-led research; further Ocean Panel and Ocean Decade goals; expand programs that connect communities (including schools) with oceans; and better coordinate research priorities. First Nations-led research can be particularly important in assisting policymakers to understand the interconnectedness of natural systems and threats.⁵⁶ These are important priorities to effectively equip Australia with the knowledge required to sustainably manage 100% of our EEZ.

However, the SOP does not acknowledge that 'the ocean crisis is developing faster than our knowledge of it', and the urgent need for a 'more dynamic interplay between ocean knowledge, policy and action'.⁵⁷ A frank assessment of the science, with a focus on threat mitigation and management, is an essential starting point for the SOP and particularly for this section. The assessment in *Australia's State of the Environment* report would

⁵⁵ The 2nd Oceania first voices regional forum outcome statement (2024), < https://wwfasia.awsassets.panda.org/downloads/1--wwf_-the-2nd-oceania-first-voices-regional-forum-2024-report_web-version.pdf>

⁵⁶ H. Wheeler & M. Root-Bernstein, 'Informing decision-making with Indigenous and local knowledge and science', *Journal of Applied Ecology*, (2020), 1634-1643, <https://doi.org/10.1111/1365-2664.13734>

⁵⁷ Henrick Enevoldsen, Kirsten Isensee and Yun Jie Lee (eds), *State of the Ocean Report 2024* (UNESCO).

provide a useful starting point: ‘many Australian marine habitats are healthy, but our reefs are declining’ and ‘even the best management will not stop environmental decline if we do not address climate change and cumulative effects’.⁵⁸ Many species are listed under the EPBC Act as threatened or vulnerable, and the outlook for reef fish, turtles, fur seals, sea lions and sea snakes is poor (with some rated as deteriorating). The Great Barrier Reef Outlook Report is an excellent example of an Australian Government assessment that both accurately reflects the poor scientific outlook for the future of the Reef, while at the same time outlining future conservation priorities.

Overall, WWF-Australia welcomes the focus on acquiring and valuing knowledge. Australia is a known leader in innovative research, which is complementary to the Traditional Knowledge systems that First Nations Australians have fostered to manage Sea Country since time immemorial. Combining these systems, establishing efficient data sharing and acknowledging Traditional Knowledge as a cornerstone of management while ensuring cultural data sovereignty is necessary to protect some of our most important and globally recognised marine resources. While much progress is still yet to be made, the integration of First Nations leadership across Australia is improving management of local and transboundary oceans, and facilitating ecological baselining and mapping, such as in south-western Australia, where the Esperance Tjaltjraak Native Title Aboriginal Corporation is leading marine research mapping marine culturally and ecologically important sites, demonstrating cultural leadership as critical for effective knowledge development and conservation.⁵⁹

However, we believe this section should be strengthened by acknowledging the responsibilities of all ocean users to support and invest in knowledge acquisition that benefits all Australians. Scaling up government investment in knowledge integrations across management at all levels, and to improve ocean literacy across the broader community will not only improve efficiency in developing and delivering national ocean protection strategies but will improve general public attitudes and support of these necessary ambitions, reducing barriers to effective implementation. As with other sections, we note that the ‘opportunities for collective national action’ do not constitute any firm commitments or plans – the plan would significantly benefit from specific commitments or actions here.

Recommendations:

1. The overview of this section should acknowledge what we already know, what we don’t know, and the need to apply the precautionary principle to all policy and decision-making regarding ocean use, while addressing knowledge gaps.
2. We welcome the SOP’s commitment to increasing First Nations-led research and ‘consideration and respect for First Nations Knowledge alongside western science’, though we recommend specifying concrete steps towards this outcome.
3. As part of Australia’s First Nations Diplomacy initiatives, the Australian Government should explore opportunities to facilitate knowledge exchange between Traditional Owners and Pacific community leaders on integrating Traditional Knowledge and custodianship through co-management of marine ecosystems.
2. The Special Envoy for Oceans recommended in the ‘Collaboration’ section above could play a valuable role in building oceans literacy and mobilising support to address knowledge gaps. Similarly, a coordination mechanism (recommended in the same section) could play an important role in determining research priorities and ensuring maximum value is derived from investment in research.
3. Further recommendations addressing critical gaps in our knowledge of ‘blue corridors’ for migratory species – including turtles, rays, sharks and cetaceans – can be found in WWF-Australia’s *Blueprint for Australian Oceans Leadership*.

⁵⁸ R. Trebilco et al., ‘Marine: Key findings’ in *Australia State of the environment 2021*.

⁵⁹ Marine and Coastal Hub, ‘Mapping temperate continental shelf seabed habitats’, <https://www.nespmarinecoastal.edu.au/project/2-1/>, accessed 12 September 2024.

PRIORITY EIGHT: FINANCE

Globally, the financing gap for activities that maintain nature and ecosystem integrity, including in oceans, is stark at over \$700B pa.⁶⁰ Of the estimated \$200B that currently goes into Nature Based Solutions, just 18% comes from private sources. On the flipside, it is estimated that almost \$7 trillion goes toward subsidising nature negative activities (e.g. fishing, shipping and gas extraction).⁶¹ Oceans are on the frontline of unsustainable practices driven by harmful subsidies and insufficient finance for maintenance and restoration. The Australian Government has a vital role to create the enabling environment to catalyse and scale private sector investment toward activities that support sustainable oceans.

The draft SOP provides limited guidance on the barriers and impediments to increasing finance for oceans. A full analysis of the impediments should be assessed to determine where intervention should focus. Barriers such as overlapping government mandates, insufficient regulatory coordination, ambiguity of property rights, high cost of project delivery, and lack of scale all act as significant impediments to finance. Investable business cases that can attract large scale finance are difficult to create under the status quo.

The SOP refers to examples that will support increased finance for sustainable oceans, including blue carbon opportunities, the Nature Repair Market and disclosures under the taskforce for nature related financial disclosures. These should not be seen as the only solution(s) for increased finance for sustainable oceans. Despite carbon markets having been established and running in Australia for over a decade, the creation and sale of blue carbon credits, through the one method created – tidal restoration – is limited. Whilst there is a significant opportunity for blue carbon, major barriers to scale exist, including project size, cost of monitoring and measurement, and the trading price of Australian Carbon Credit Units (ACCUs).

Methods developed under the Nature Repair Market will experience the same challenges as blue carbon. The inability to develop large and scalable projects due to opaque property rights, the high cost of monitoring and verification, and lack of clarity on what will drive demand will hinder the development of ocean-based projects under Nature Repair.

The government has levers beyond their current approaches to support and crowd-in more financing for sustainable oceans. Government must support approaches to improve and de-risk the business case for activities that deliver sustainable ocean outcomes. Whilst assessing and developing the enablers outlined in this section, the government should also be careful to not be too descriptive on what can and can't be done whilst markets and financing toward the ocean sector remain nascent.

Recommendations:

1. The government should focus on de-risking **revenue generating activities** from projects that protect and restore oceans. This should be done by:
 - a. Making ACCU purchases through the Emissions Reduction Fund more strategic. This should include earmarking funding specifically to purchase blue carbon credits at a premium to the spot price of ACCUs and at a price point that is reflective of the additional cost to generate these credits.
 - b. Earmarking funding for the demand side of the nature repair market. Similar to the establishment of the Emissions Reduction Fund when the carbon market was created, funding must be allocated to underwrite demand for the nature repair market, at least in the initial years.
2. The government should also provide further support for activities that reduce costs to deliver high integrity blue carbon and nature repair markets. This can be done by supporting research and development of

⁶⁰ Paulson Institute, Financing Nature: closing the global biodiversity financing gap, 2020.

⁶¹ UNEP, State of Finance for Nature, 2023

innovations and technologies, such as drone and AI technology that delivers, monitors and verifies the impact of projects in the ocean.

3. The government should also focus on strengthen the enabling environment. The draft SOP refers to building capability and investment framework but provides little detail on what this might entail. Specific areas that should be addressed include:
 - a. Allocate resources toward improving coordination and governance in decision making in the ocean, including better clarity on the allocation of rights (e.g. property rights, native title rights etc).
 - b. Assess opportunities to better use fiscal policy, including subsidies and taxes to shift activities that are harmful to oceans, to activities that restore and sustain.
 - c. Expedite mandatory disclosures (TNFD) for operators utilising ocean resources.

CONCLUDING COMMENTS

The SOP clearly articulates the importance of Australia's marine ecosystems not just to Australia, but also to the marine biodiversity of the entire planet. Australia is, as the Plan notes, home to some of the most biodiverse ocean ecosystems in the world. Our waters are home to wetlands of international importance, some of the world's largest reef systems, 12% of the world's blue carbon ecosystems, the third largest area of mangroves globally and nearly half of the world's seagrass species. What happens in Australia's EEZ matters greatly to biodiversity at a global scale. It is therefore critical that Australia's SOP articulates a clear vision and action agenda for sustainable oceans management and protection, that enables our ocean ecosystems to thrive.

WWF-Australia commends the SOP process and draft as a first step but notes significant gaps that need to be addressed prior to finalising the Plan. A great deal of time and effort has been invested into consulting on and developing Australia's Sustainable Oceans Plan, and it is important that these efforts result in a Plan that is fit for purpose. The current version is not capable of driving the change required, at the speed and scale needed to address urgent and major threats to our oceans.

We urge the Government to ensure that the next iteration of the SOP addresses the above matters prior to its finalisation. As a country with a proud history of ocean protection, much of it enjoying cross-partisan support, Australia's SOP can and should be a robust, ambitious and specific plan that acts as a source of inspiration and guidance to other countries. Based on consultation with WWF's international network, including experts deeply engaged with the Ocean Panel, it is our view that the SOP in its current form does not demonstrate the level of leadership that would be expected of Australia, particularly given its historic role in pioneering marine spatial planning, and as one of the world's few mega-diverse countries.

We look forward to engaging with the government on Australia's draft SOP further, including through this consultation and the Oceans Dialogue in October at the Nature Positive Summit. To discuss further in the meantime, or for more information, please contact Kate Noble, Senior Manager Oceans Policy: knoble@wwf.org.au and 0416 649 459.

For more information

Rick Leck
Head of Oceans/Saltwater
rleck@wwf.org.au

Kate Noble
Senior Manager Oceans Policy
knoble@wwf.org.au



Working to sustain the natural world for the benefit of people and wildlife.

together possible. wwf.org.au

WWF-Australia National Office
Level 1/1 Smail Street, Ultimo NSW 2007
GPO Box 528, Sydney NSW 2001
Tel: +1800 032 551 | enquiries@wwf.org.au | wwf.org.au