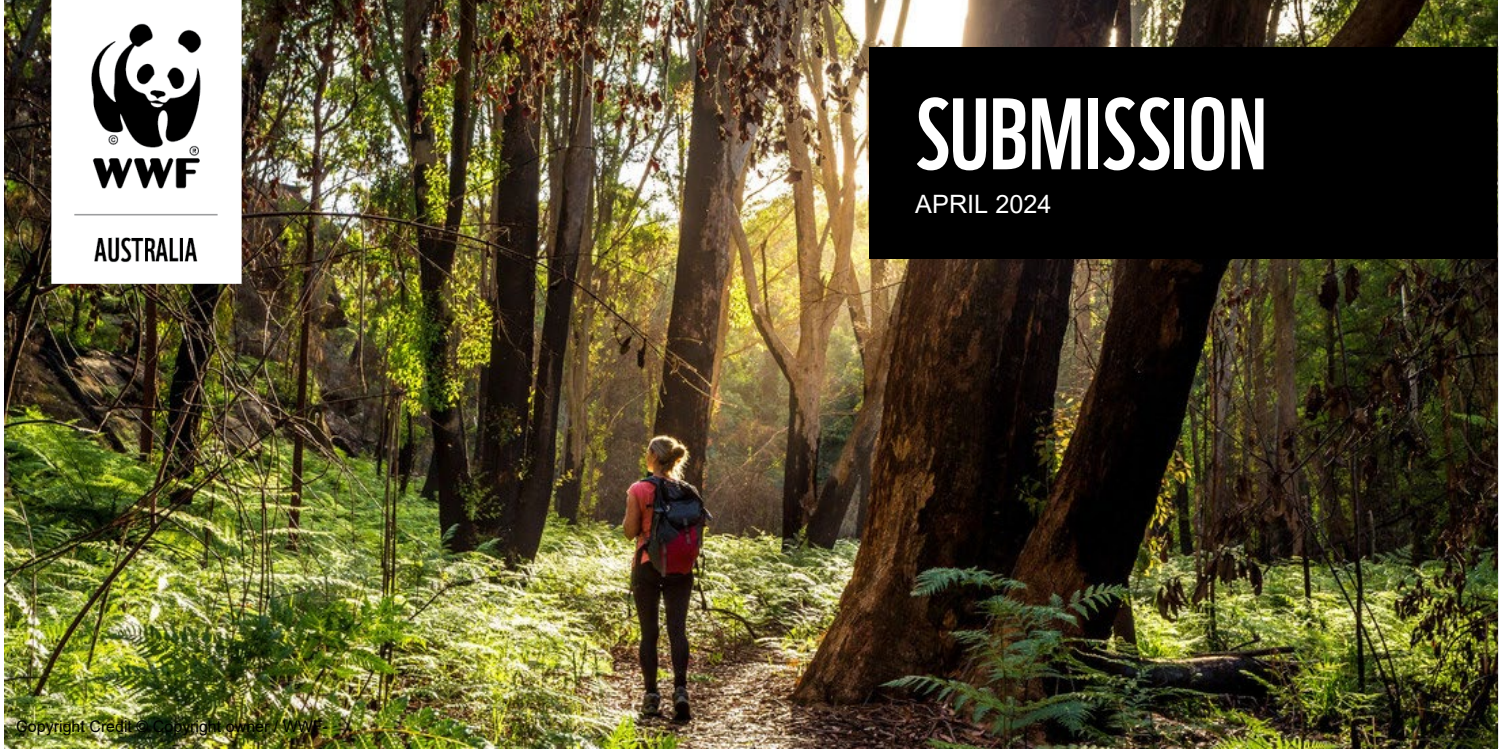

DISCUSSION PAPER: UPDATING AUSTRALIA'S STRATEGY FOR NATURE

The World Wide Fund for Nature-Australia (WWF-Australia) welcomes the opportunity to provide feedback to the Department of Climate Change, Energy, the Environment and Water's Discussion Paper: Updating Australia's Strategy for Nature.

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 build a future in which humans live in harmony with nature'. WWF-Australia's views are grounded in decades of rigorous research by eminent scientists. WWF-Australia has approximately two million financial and non-financial supporters.

An overview of the key issues raised by the Discussion Paper is outlined in this introductory section, while a more detailed response to the six priority areas and three enablers of change proposed in the Discussion Paper is outlined in the main section of the submission.

INTRODUCTION

All Australian targets should be equivalent to, or stronger than, the GBF targets

WWF-Australia welcomes the Australian Government's proactive role in the negotiation and adoption of the Kunming-Montreal Global Biodiversity Framework (the GBF), as well as Australia's commitments to the 2030 and 2050 goals and targets that form the backbone of the GBF.

WWF-Australia notes that the Goals and Targets set out in the GBF are the minimum global efforts required to halt and reverse nature loss by 2030. As the GBF needs to be largely implemented at the national level, Australia's National Biodiversity Strategy and Action Plan (NBSAP) should include the highest possible level of ambition permitted by national circumstances to protect, conserve and sustainably use biodiversity, while ensuring fair and equitable sharing of its benefits, in order to halt and reverse biodiversity loss by 2030 and secure a nature-positive future. Australia's NBSAP must be comprehensive and outline how all the principles and approaches described in

Section C of the framework are applied and monitored.[1] The Convention on Biological Diversity's guidance for revising or updating NBSAPs (Annex I of CoP Decision 15/6) should be treated as the minimum requirement for Australia's NBSAP, but not the ceiling for national ambition.

When integrating the GBF targets into the Australian context, the Australian Government must ensure that targets and actions are specific, measurable, achievable, realistic and timebound (SMART). They should consider the effectiveness of past actions, existing monitoring systems and cross-sectoral policies, amongst other things (see para 7 of annex 1 of CoP Decision 15/6), plus include an analysis of i) biodiversity assets, values, threats and drivers, and opportunities; ii) the socio-economic context and iii) the circumstances and needs of vulnerable groups.[2]

Broadly, WWF-Australia's position is that a number of the proposed targets in the Discussion Paper are not SMART, in the sense that many are neither specific, measurable, nor timebound. This includes the proposed Australian targets in response to GBF Targets 2, 6, 7 and 16.

Additionally, many of the proposed targets in the Discussion Paper are weaker than the GBF equivalent targets that the Australian Government has committed to. For example, in GBF Target 2, the qualifier 'at least' has been removed from the proposed Australian target, while it is included in the GBF target (i.e. 'at least 30 per cent'). Likewise, in Priority Area 3: 'Building a circular economy and reducing the impact of plastics on nature', the language options for the proposed target ('grow or expand a circular economy') could in theory be achieved through modest improvements, rather than the systems level, at scale change required. The Australian Government should reword many of the proposed targets to adequately reflect the ambition of the GBF. Suggestions for how this could be achieved are included in the main section of the submission.

Protection targets need to be consistent with the goal of 'zero extinctions'

The protection targets (GBF Targets 2 and 3) and the commitments to halt human-induced extinction (Goal A and Target 4) need to work together, ensuring that the amount of protected area can genuinely facilitate and enable the ability to halt human-induced extinctions.

For example, there is a strong argument that Goal A (Human induced extinction of known threatened species is halted, and, by 2050, the extinction rate and risk of all species are reduced tenfold and the abundance of native wild species is increased to healthy and resilient levels) cannot be achieved with 30% high level marine protection. Within the literature, a target of 50-70% is regarded as potentially capable of achieving such a result. More detail on this is provided in the main section of the submission.

Human rights-based approach, the precautionary principle and intergenerational equity

GBF parties are required to implement and evaluate the GBF commitments in a way that is consistent with both the precautionary principle and intergenerational equity, however there is no mention of either in the Discussion Paper. More broadly, Australia's NBSAP must also outline measures to respect, promote and fulfil human rights, including the human right to a clean, healthy and sustainable environment, the rights to land and sea, resources, and (as is covered in the Discussion Paper) full and equitable participation of Indigenous People and local communities, as well as women and youth. Actions must be specific for each relevant target and element of the NBSAP.[3]

If you require further information about this submission, please contact Quinton Clements, Head of Policy and Horizon Scanning, WWF-Australia on QClements@wwf.org.au or 0419 626 268.

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[1] WWF (2023). The NBSAPs We Need: WWF's Criteria for Ambitious NBSAPs, https://wwfint.awsassets.panda.org/downloads/wwf-nbsaps-we-need-2023_final.pdf
[2] WWF (2023)
[3] WWF (2023)

PRIORITY AREA 1: Effective restoration of degraded terrestrial, inland water, and coastal and marine ecosystems

GBF Target 2:
Ensure that by 2030 at least 30% of areas of degraded terrestrial, inland water, and coastal and marine ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services.

Proposed Australian target:
30% of priority degraded areas under effective restoration by 2030.

1. **What do you think of this target? Does this target appropriately apply GBF target 2 to the Australian context? If not, what needs to be included or removed from this target to improve the national focus?**

WWF-Australia's position is that the Australian Government's proposed target does not adequately reflect the intent of GBF Target 2. In relation to the terrestrial aspect, we have a number of concerns about the use and definition of "priority degraded areas". The locations of the priority degraded areas still need to be determined, and there is a real concern that determining what constitutes a "priority degraded area" will be time-consuming and divert resources away from the actual restoration work that needs to occur by 2030, as the Australian Government has committed to under the GBF.

In addition, there is no specific information provided about the proportion of Australia that will be determined as a "priority degraded area". As a result, the proportion of Australia that the Australian Government is intending to restore under the proposed target is unclear. As the Discussion Paper notes, the 2021 State of the Environment report found that at least 50% of remaining habitats in Australia are highly degraded.[4] It is unclear whether the Australian Government is committing to restore 30% of the 50% of the remaining degraded habitats. Without defining the extent of the degraded areas, the current target as it is currently worded is not appropriate and does not align with the intent of GBF Target 2. We recommend that the target should be reworded to clarify the above issues.

Further, as Target 2 relates to marine environments, WWF-Australia recommends that it should comprise the following components:

At least 30 percent of areas of degraded inland water, and marine and coastal ecosystems within Australia's ecosystem are under effective restoration, meaning science-based identification of specific areas to be actively restored or protected to enable natural regeneration. Addressing research gaps and establishing priority areas, including numerical targets, must be completed as soon as possible.

Further detail on WWF-Australia's position relating to ocean protection is included under Priority Area 5.

2. **What additional action needs to occur for Australia to reach this target? Any barriers to overcome or opportunities to harness? How could the enablers of change (environmental data; mainstreaming biodiversity considerations into decision-making; and equitable participation in nature related decisions) contribute to this target?**

For Australia to reach this target, appropriate funding is needed, which reflects the extent to which habitat in Australia has been degraded. As mentioned above, the State of the Environment report found that "at least 50% of remaining

[4] Cresswell ID, Janke T & Johnston EL (2021). Australia state of the environment 2021: overview, independent report to the Australian Government Minister for the Environment, Commonwealth of Australia, Canberra. DOI: 10.26194/f1rh-7r05

habitats are highly degraded" in Australia.[5] Further recommendations for opportunities to reach this target are outlined in response to Priority Area 5.

WWF-Australia's position is that the first priority for enablers of change should be to establish a specific and measurable target that is informed by the available science. The concerns about the current wording of the target are outlined above in our response to Question 1.

Secondly, as noted above, adequate funding, resources and capacity should be made available for active restoration. The active restoration of priority areas will be critical to Australia recovering robust and resilient populations of threatened species.

There is an urgent need for the development of high-quality, high-integrity restoration programs that are environmentally and economically sustainable and scalable. These programs should be developed in collaboration with First Nations groups.

3. **Are you (or your organisation) taking action to contribute to the target? If so, what contributions are you making and which enablers are you using?**

WWF-Australia is working with First Nations organisations, government agencies and community groups to restore Country, through biocultural management practices that include right-way fire, threat mitigation, replanting destroyed habitat, supplementing degraded habitat with essential resources for threatened species, and rewilding lost species. WWF-Australia is also working with the cattle production industry to help determine more sustainable agriculture practices. In addition, we are supporting the development of business cases for a just and fair transition from destructive native forest logging to sustainable plantation-based timber industries.

PRIORITY AREA 2: Tackling the impact of invasive species

GBF Target 6:
Eliminate, minimise and or mitigate the impacts of invasive alien species in biodiversity and ecosystem services by identifying and managing pathways of the introduction of alien species, preventing the introduction and establishment of priority invasive alien species, reducing the rates of introduction and establishment of other known or potential invasive alien species by at least 50 per cent by 2030, and eradicating or controlling invasive alien species, especially in priority sites, such as islands.

Proposed Australian target:
Minimise the impact of invasive species on biodiversity in our most precious places by 2030.

1. **What do you think of this target? Does this target appropriately apply GBF target 6 to the Australian context? If not, what needs to be included or removed from this target to improve the national focus?**

WWF-Australia's view is that the wording, "our most precious places", in the proposed Australian target is too vague and needs to be clarified. It is unclear whether this wording refers to the priority places that the Australian Government has already identified in the Threatened Species Action Plan. Without defining the extent of the "most precious places", this target is neither specific nor measurable, and progress against it cannot be tracked.

In addition, we are concerned that the draft target only partially addresses the GBF target, with no focus at all on prevention, and it fails to specify any measurable outcome. The current draft target would set Australia up to fail to

[5] Cresswell ID, Janke T & Johnston EL (2021)

meet the GBF commitment to 'eliminate, minimise and or mitigate the impacts of invasive alien species on biodiversity and ecosystem services'.

2. **What dedicated initiatives would you like to see for managing invasive species in Australia?**
    a. **For example, research initiatives, international collaboration, on-ground work, information sharing etc.**

A significant increase in on-the-ground work is required to manage invasive species in Australia. This should be coupled with adequate funding. We know that several invasive species require active management, however on-the-ground implementation is not occurring, due to both a lack of adequate prioritisation and lack of capacity for implementation.

    b. **How could the enablers of change (environmental data; mainstreaming biodiversity considerations into decision-making; and equitable participation in nature related decisions) contribute to this target?**

There are a number of enablers of change which could contribute to this target. These include providing support for First Nations organisations, government protected areas, and non-government protected areas, to enable greater on-ground action. Equitable participation will be essential to this target being met and could provide a diverse portfolio of employment opportunities related to invasive species management. Such a diversification could offer new opportunities for sustainable industries associated with pest management (for example, invasive species game hunting and associated industries), and may provide numerous jobs and rural livelihood opportunities.

3. **What do you think will increase community support for the need to control invasive species to avoid species extinctions?**
    a. **What is the best method to enable and support individual contribution and behaviour changes from members of the community?**

WWF-Australia's position is that Australian Government provision of financial incentives and support for a sustainable industry associated with invasive species management will be essential, to facilitate the involvement of individuals and communities in controlling invasive species. This could include grants and schemes to facilitate invasive species management, financial incentives that support the establishment or diversification of businesses monetising this industry (for example, game hunting and artisanal products from meat and other management by-products).

4. **Are you (or your organisation) taking action to contribute to the target, if so, what contributions are you making and which enablers are you using?**

WWF-Australia is supporting implementation of First Nations Healthy Country Plans, which include components of threat mitigation and management of invasive species.

PRIORITY AREA 3: Building a circular economy and reducing the impact of plastics on nature

GBF Target 7:
Reduce pollution risks and the negative impact of pollution from all sources, by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering the cumulative effects, including: reducing excess nutrients lost to the environment by at least half including through more efficient nutrient cycling and use; reducing the overall risk from pesticides and highly hazardous chemicals by at least half including through

integrated pest management, based on science, taking into account food security and livelihoods; and also preventing, reducing and working towards eliminating plastic pollution.

GBF Target 16:
Ensure that people are encouraged and enabled to make sustainable consumption choices including by establishing supportive policy, legislative or regulatory frameworks, improving education and access to relevant and accurate information and alternatives, and by 2030, reduce the global footprint of consumption in an equitable manner, including through halving global food waste, significantly reducing overconsumption and substantially reducing waste generation, in order for all people to live well in harmony with Mother Earth.

Proposed Australian target:
[Expand/grow/maximise/increase] the circularity of Australia's economy by 2030, to reduce the impact of pollution and habitat destruction.

1. **What do you think of this target?**
    a. **Does this target appropriately apply GBF targets 7 and 16 to the Australian context? If not, what needs to be included or removed from this target to improve the national focus?**

WWF-Australia's position is that the language options in the proposed Australian target, "expand/grow/maximise/increase", do not constitute a SMART target. The target needs to either explicitly state reduction targets and/or circularity targets, combined with a clear definition of circular economy. Greater specificity should be provided on both the baseline and the metrics that will be measured for circularity - for example, reduction of virgin materials consumption, reduction of single-use plastic consumption, recovery and recycling rates, and volume and proportions being landfilled. Targets such as those outlined by the CSIRO under their Circular Economy Roadmap should be considered. The context alludes to a heavy focus on plastics. It is unclear what "circular economy" elements the Australian Government would focus on, and the other items mentioned in the GBF goals (for example, food, toxic pesticides, highly hazardous chemicals) are not explicitly addressed in the context statement.

In addition, the language options proposed are significantly weaker targets, when compared with those in the GBF. In our view, maximise is most consistent with the GBF ambition. The proposed target would benefit from a clear articulation of what maximise means in practice. An example of this relating to plastics can be found in CSIRO's Circular Economy Roadmap, which provides Sankey diagrams based on current plastic flows and fates, and proposed 2030 targets under an optimised circular economy scenario.[6]

We suggest adding language along the lines of 'reducing/halving virgin materials use', which is both consistent with the GBF and references to circularity. It could be argued that significant consumption is implicit in 'circularity', but the term is widely misunderstood to mean 'circulation' in terms of recyclability/recycling, rather than significant reduction of consumption AND waste, keeping materials in their original form and circulation for as long as possible, in addition to effective management/recycling pathways.

In addition, the target is missing the "reduce" element of pollution. The first priority should be to reduce usage of pesticides, hazardous chemicals and materials where possible, and then look at reusing the material at the highest possible value and reducing leakage in the form of pollution.

To make the target SMART, a specific number needs to be included. An improved target would be, for example, a meta-target to increase the circularity of the Australian economy from 5% by 2030 to 20%. Examples of other targets include:

- X% reduction in fertiliser and pesticide use

[6] Schandl H, King S, Walton A, Kaksonen AH, Tapsuwan S and Baynes TM (2020) National circular economy roadmap for plastics, glass, paper and tyres. CSIRO, Australia.

- Halving food waste and X% productivity increase
- X% reduction in building waste and materials use

Further, there should be an inclusion of extended producer responsibility (EPR), a financial penalty on plastics, and more consumer education and support for industry to transition.

To meet the ambition and requirements of the GBF, there needs to be some work done to develop sectoral targets and plans, so that each sector can align to the meta target on circular economy. A reduction roadmap would look at aligning with the Paris Agreement and the Planetary Boundaries work and applying it to each sector. It would identify where we are today, where we need to go, and the speed at which we need to reduce to keep within the planet's safe operating space. It would look at the life cycle assessment of each sector and develop a roadmap for reduction. As an example of what is necessary for each sector, the Danish housing industry undertook such a project - its footprint is 9.63kgCO2/m2/year, to reduce to 0.40kgsCO2/m2/year.[7]

Finally, there needs to be a separate focus and target on the reduction of pesticide and other hazardous chemicals, given that they impact severely on insect species and groundwater and soil health. Further focus should also be given to nutrient cycling and use, given that we know the higher uses of fertilisers flow into waterways and impact water quality and run off, affecting coral reefs, including the Great Barrier Reef. In line with this is the need for a behaviour change strategy that looks at the drivers of over-consumption and waste generation - one that has different strategies for businesses and consumers, and which considers the role of governments across and the voluntary and regulatory landscapes.

2. **What additional action needs to occur for Australia to reach this target?**
    a. **Any barriers to overcome or opportunities to harness?**
    b. **How could the enablers of change (environmental data; mainstreaming biodiversity considerations into decision-making; and equitable participation in nature related decisions) contribute to this target?**

Enablers of change should consider both 'carrots' and 'sticks'. As a carrot, the Australian Government could focus on promoting 'brand Australia' as a place where goods are produced in a circular and nature-positive way - where natural capital is conserved and restored by every industry, and waste and pollution are minimised through better design and longer use of products. With global markets increasingly demanding transparent supply chains and evidence that products are produced sustainably, Australian farmers and manufacturers can confidently sell into this growing green market.

As a stick, users of raw materials should bear the cost of the harm caused by their activities and throughout their value chains. This may include regulations that impose an additional cost for use of virgin materials and other requirements, such as mandatory whole-of-lifecycle reporting. Ultimately, there will be insufficient incentive to go circular until the adverse costs of externalities are fully internalised.

The Australian Government should consider the resources of highest priority for a circular economy in Australia and then test the approach with these high priority commodities. Priority could be based on environmental impact, feasibility for participation in a circular economy market, and the size of the issue (for example, volume of demand for a particular good or projected growth in usage).

The barriers to overcome for Australia to reach this target include reaching a sufficient scale so as to be of interest to industry and developing standardised international classifications for material reuse quality.

[7] https://reductionroadmap.dk/reduction-roadmap

3. **Are you (or your organisation) taking action to contribute to the target, if so, what contributions are you making and which enablers are you using?**

WWF-Australia's No Plastics in Nature initiative works to eliminate the leakage of plastic into the environment, phase out the most problematic plastics, build a circular economy for plastics, and help drive global action to address plastic pollution.

Our focus is on developing effective regulatory frameworks at multiple levels of government to reduce plastic consumption to more sustainable levels, eliminating single-use products most likely to become pollution, encouraging policies and investment to drive reuse in Australia, identifying and addressing evidence gaps to help informed policy and decision-making, and advocating for effective global regulation to end plastic pollution via our engagement in UN negotiations towards an international instrument to end plastic pollution.

PRIORITY AREA 4: Minimising the impact of climate change on nature

GBF Target 8:
Minimise the impact of climate change and ocean acidification on biodiversity and increase its resilience through mitigation, adaptation, and disaster risk reduction actions, including through nature-based solutions and/or ecosystem-based approaches, while minimising negative and fostering positive impact of climate action on biodiversity.

Proposed Australian target:
Embed climate change adaptation into decision-making by 2030, to support increased resilience of biodiversity.

1. **What do you think of this target?**
    a. **Does this target appropriately apply GBF target 8 in the Australian context? If not, what needs to be included or removed from this target to improve the national focus?**

WWF-Australia's position is that the proposed Australian target does not reflect the intention or ambition of GBF target 8.

Embedding climate change adaptation into decision-making is critical, however 2030 is too far away and does not capture the urgency with respect to the impacts of climate change on Australian biodiversity. A report by WWF-Australia found that nearly 3 billion animals were impacted by the 2019/2020 bushfire crisis, including nearly 40 million possums and gliders and more than 60,000 koalas.[8] In addition, as critical as adaptation is, it must be supported by ambitious mitigation action, including a Nationally Determined Contribution (NDC) that is backed by science.

Climate change mitigation is one of the key components of the GBF, however, in the proposed Australian target, there is no mention of mitigation or minimising the impacts of climate change. Australia will not be able to achieve climate resilience through adaptation alone - mitigation activities are critical. Without mitigation, the Australian Government will not meet its "working towards zero extinctions" target or several other targets. Additionally, the Australian Government commitment to net zero emissions by 2050 will be too late for several threatened species. Mitigation must be included for an adequate biodiversity response, or alternatively, the Australian Government needs to commit to a more ambitious net zero emissions target. WWF-Australia recommends an emissions reduction target of at least 90% below 2005 levels by 2035.

[8] WWF-Australia (2020), 'Impacts of the unprecedented 2019-20 bushfires on Australian animals, https://assets.wwf.org.au/image/upload/v1/website-media/resources/WWF_Impacts-of-the-unprecedented-2019-2020-bushfires-on-Australian-animals.

Finally, this target is not measurable or able to be tracked - it is unclear what the Australian Government means by "embed climate change adaptation into decision-making". The wording of this target needs to be amended to take into account the above issues and to include the role of climate change mitigation in halting and reversing biodiversity loss.

2. **What are key considerations for embedding climate adaptation into decision-making? Noting this is related to one of the enablers of change (mainstreaming biodiversity considerations into decision-making).**

A key consideration for embedding climate change adaptation into decision-making will be ensuring that it is adequately funded. This will often mean that the Australian Government will need to prioritise the most effective and impactful option over the least-cost option.

3. **What challenges do you foresee in integrating climate change and biodiversity policies, and how might we best overcome these?**

Policy decisions on activities to combat climate change and support biodiversity must be done in parallel. This is currently not the case. For example, policies focussed on reducing emissions, such as the Safeguard Mechanism, have no equivalent or consideration to protect nature and biodiversity. This reduces the impact these types of policies can have. With respect to the Safeguard Mechanism, companies and carbon developers are establishing large tree planting projects to generate carbon credits to meet their requirements, but these tree plantings are done in such a way as to sequester maximum carbon at the lowest price point, rather than considering the potential for biodiversity benefits. This is resulting in largely monoculture tree plantings, with 25-year permanence periods, which do not replicate the natural ecosystem. Policies should therefore be developed, and incentives put in place, to encourage biodiversity considerations, along with carbon considerations. The Australian Government should consider a Safeguard Mechanism equivalent, focussed on biodiversity and nature.

The Australian Government should also support the integration of climate and biodiversity activities, via the creation of a large funding pool to underwrite high risk/high impact projects targeting both carbon and nature. This could replicate the Queensland Government's Land Restoration Fund, but on a national scale.

Options to consider include:

- The Clean Energy Finance Corporation (CEFC) could offer seed capital to establish and scale ('proof of concept') business models that create verified nature and biodiversity benefits.
- The Australian Government could offer co-payments for carbon projects that deliver verified co-benefits for nature and/or Indigenous communities.
- The Australian Government could offer technical assistance to private firms (for example, landholders) seeking to deliver nature positive carbon credits.

Another key challenge in integrating climate change and biodiversity policies is in ensuring that the goal of 'net zero emissions' (and the need to expand renewable energy production) and the goal of 'no new extinctions' work in tandem. There have been examples of existing environmental approval processes - necessary to determine the impacts of a development on environmental, cultural and biodiversity values - being bypassed in order to approve new renewable energy projects. While both 'net zero emissions' and 'no new extinctions' are critical, they should not be in opposition and should instead work together. This will require strict environmental approval standards to determine the suitability of projects with respect to biodiversity conservation.

4. **Are you (or your organisation) taking action to contribute to the target, if so, what contributions are you making and which enablers are you using?**

WWF-Australia has a number of programs which seek to address these issues, including Koala Friendly Carbon, a first-of-its-kind carbon program to help restore koala habitat, Nature Based Solutions for the Kimberley, and Climate Ready Restoration for Australia's South-East Forests.

In addition, WWF-Australia works with First Nations people and groups on nature-based solutions that include biocultural management practices, such as right-way fire, to reduce carbon emissions. WWF-Australia is also working with researchers, First Nations organisations and other land stewards to implement climate adaptation activities, such as climate ready restoration projects, nest box refugia, and planning of restoration activities, with a focus on addressing the future impacts of climate change.

PRIORITY AREA 5: Protect and conserve 30% of Australia's land and 30% of Australia's oceans by 2030

GBF Target 3:
Ensure that by 2030, at least 30 percent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognising indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognising and respecting the rights of indigenous peoples and local communities, including over their traditional territories.

Australian target:
Protect and conserve 30% of Australia's land and 30% of Australia's oceans by 2030.

1. **What factors should inform where we focus our efforts to achieve the 30% target on land?**

A report by WWF-Australia, the Australian Land Conservation Alliance (ALCA), the Nature Conservancy, and the Pew Charitable Trusts, Protecting Australia's Nature: Pathways to protecting 30 per cent of land by 2030 contained three principles and four recommendations for the Australian Government to progress the most effective pathways to protect at least 30 per cent of Australian land in a comprehensive, adequate and representative manner and meet Target 3 of the GBF.[9]

The three principles outlined in the report are:

1. Recognise the rights and interests of First Nations peoples. Practical steps to recognition can include dedicated, financially supported and leading roles in policy design, governance, implementation, and management of protected areas.
2. Continue to use Australia's science-based framework and the CAR (Comprehensive, Adequate and Representative) principles to guide the prioritisation for new protected areas.
3. Increase ecosystem representation across the National Reserve System through investment in public, private and Indigenous protected areas across all levels of government.

The four recommendations for the Australian Government are:

1. Establish a new dedicated $5 billion fund for the purchase of land of high biodiversity importance to create new public, private or Indigenous protected areas.

[9] https://www.nature.org/content/dam/tnc/nature/en/photos/australia/Report3030_FINAL_web.pdf

2. Rebuild government capacity and continue to support the creation of new Indigenous Protected Areas (IPAs) to meet Traditional Owner demand and aspirations and establish secure long-term funding for IPA management.
3. Increase support for the uptake of permanent conservation covenants through:
    a. Providing direct federal support to state and territory conservation covenant programs with an explicit focus on expanding the uptake and execution of new conservation covenants expanding the protected area estate in under-represented bioregions and ecosystems.
    b. Supporting states and territories to develop enhanced protection conservation covenants in their jurisdictions, in order to attract larger scale private conservation investment.
    c. Instigating a Treasury or Productivity Commission review into federal and state tax and financial incentives and barriers to private land conservation.
4. Partner with states and territories to systematically review Crown land to identify areas of high conservation significance and subsequent protected area opportunities consistent with the principles of comprehensiveness, adequacy and representativeness (CAR), and enable jurisdictions and Traditional Owners to undertake the necessary negotiations.

2. What should be the priorities in understanding the effectiveness of our marine protected estate and strengthening protection of our oceans?

WWF-Australia's overarching feedback on this section is that it is implicit that GBF Target 3 has already been achieved, however this is highly dependent on the definition of 'effective protection'. In our view, 'effective protection' has not yet been achieved. Please see below for our recommended wording for Target 3 and the changes the Australian Government needs to make in order to meet this threshold.

Australia's network of marine protected areas (MPAs) covers approximately 4 million km², constituting 45% of Australia's exclusive economic zone (EEZ). However, less than one quarter of the EEZ is highly protected (IUCN category I or II).[10] This leaves swathes of vulnerable and precious ecosystems and habitats lacking in sufficient protection, risking further degradation and nature loss. This is critically important, given that approximately 80% of all marine species in Australian waters are found nowhere else on earth.[11]

There is significant and growing evidence of the effectiveness of highly protected MPAs and no-take zones in safeguarding habitats, providing refuge for endangered species and allowing depleted fish populations to recover and thrive.[12] In contrast, evidence suggests lower levels of protection fail to deliver on conservation benefits, which is the key purpose of MPAs.[13]

A systematic downgrading of MPAs in Australia in 2018 saw Australia become the largest contributor globally to the downgrading of MPAs.[14] While there have been some welcome marine protection commitments made in recent years

[10] Collaborative Australian Protected Areas Database (CAPAD) 2022, Commonwealth of Australia (Marine National, Version 2); Commonwealth of Australia (2000). Environment Protection and Biodiversity Regulations 2000; Australian Government. Australian IUCN Reserve Management Principles for Commonwealth Marine Protected Areas. The total EEZ area of 8,939,192 km2 is based on the ratification of Perth 97 treaty EEZ. It includes external territories of Norfolk Island, Christmas Island, Cocos (Keeling) Islands and Heard Island and McDonald Islands.

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

[12] Sala, E. & Giakoumi, S. (2018) No-take marine reserves are the most effective protected areas in the ocean, ICES Journal of Marine Science, 75:3, 1166–1168; Edgar, G., Stuart-Smith, R. & Willis, T. (2014) Global Conservation outcomes depend on marine protected areas with five key features. Nature, 506, 216-220.

[13] Giakoumi, S. et al (2017) Ecological effects of full and partial protection in the crowded Mediterranean Sea: a regional meta-analysis. Scientific Reports 7; Harildon M. et al (2022) Drivers of ecological effectiveness of marine protected areas: A meta-analytic approach from the Southwestern Atlantic Ocean (Brazil), Journal of Environmental Management, 301.

[14] Albrecht, R. et al (2021) Protected area downgrading, downsizing, and degazettement (PADDD) in marine protected areas, Marine Policy, 129.

- including expanded protection for Macquarie and Coco (Keeling) Islands - the current situation remains incompatible with Australia's current international and domestic commitments, and global leadership aspirations.

WWF-Australia's view, grounded in decades of rigorous research by eminent scientists, is that Australia's GBF Target 3 commitment in marine environments should comprise:

Target 3: *At least 30 per cent of marine and coastal areas should be fully or highly protected (IUCN categories I/II), to meet our obligations to effective conservation and management of high biodiversity importance areas. The identification of all marine protected areas should be grounded in science and the comprehensive, adequate and representative (CAR) principles.*

3. **What do you consider the barriers and opportunities to reaching the 30 by 30 target?**

WWF-Australia's outline of some of the opportunities and barriers to reaching the 30x30 target is provided in Discussion Question 1.

Further, we note that the 30x30 target enjoys a strong public mandate. Australia's 30x30 commitment is almost universally supported by Australians, with 93% believing it is important to ensure 30x30 protection on land and at sea.[15] We also note that 30x30 marine protection is widely recognised as a minimum requirement to mitigate biodiversity loss at the global level.[16]

Importantly, Australia has the third largest Exclusive Economic Zone (EEZ) in the world;[17] is considered one of only 17 megadiverse countries; and boasts significant scientific, technological and management resources; and strives to be a global leader on oceans. The scientific evidence base supports 30-70% protection of land and sea internationally, with 50% supported as a mid-point, and up to 100% for particular areas such as turtle nesting beaches.[18] Australia and surrounding areas have been identified as disproportionately important to achieving GBF targets globally due to high levels of species richness and genetic diversity.[19]

4. **Are you (or your organisation) taking action to contribute to the target, if so, what contributions are you making and which enablers are you using?**

WWF-Australia strongly supports the 30x30 goal as a nature-based solution to the nature and climate crises. It parallels WWF-Australia's goal of securing 30% of seas within marine sanctuaries and aligns well with Regenerate Australia, ultimately furthering Australia's global role as a leader in protected and conserved areas. WWF-Australia's Regenerate Australia program includes work to double the number of koalas across eastern Australia by 2050 and 'Towards Two Billion Trees', which seeks to move Australia from a deforestation hotspot to a global reforestation leader by 2030.

PRIORITY AREA 6: Work towards zero new extinctions

GBF Target 4:
Ensure urgent management actions to halt human-induced extinction of known threatened species and for the recovery and conservation of species, in particular threatened species, to significantly reduce extinction risk, as

[15] Biodiversity Council. 2024 Biodiversity Concerns Report: A survey of community attitudes to nature conservation.
[16] Woodley, S. et al (2019) A review of evidence for area-based conservation targets for the Post-2020 Global Biodiversity Framework. PARKS, 25(2): 19–30; O'Leary, B. et al (2016) Effective Coverage Targets for Ocean Protection. Conservation Letters, 9: 398-404.
[17] McCormick, B. Oceans, Parliament of Australia. Accessed 18 March 2024.
[18] MRWG Science Advisory Panel, 2001. How large should marine reserves be?; Beaver, D. and Llewellyn, G. p 78.
[19] Fan, H. et al. (2023). Conservation priorities for global marine biodiversity across multiple dimensions, National Science Review, Volume 10, Issue 6.

well as to maintain and restore the genetic diversity within and between populations of native, wild and domesticated species to maintain their adaptive potential, including through in situ and ex situ conservation and sustainable management practices, and effectively manage human-wildlife interactions to minimise human-wildlife conflict for coexistence.

Australian target:
Work towards zero new extinctions.

1. **Where should efforts be focused to help meet this target?**

WWF-Australia's position is that the proposed Australian target does not reflect the intent or urgency of GBF target 4.

We have a number of concerns about the proposed wording of the Australian target. Firstly, "Work towards zero extinctions" is not an effective target, as it is neither measurable nor timebound. Secondly, the target does not address the urgency of the wording in the GBF target to "significantly reduce extinction risk" and recover species. Ensuring zero new extinctions will require active protection and recovery of species. This includes the need for the Australian Government to track the recovery of species and to consider if and how the objectives to recover species are being met.

In addition, the Australian Government needs to provide more resources for recovery plans and recovery teams for all species. Currently, this process is reliant on volunteers. Indigenous ecological knowledge should also be integrated into species recovery plans. Finally, threat mitigation is essential in the goal of zero extinctions. This includes addressing the priority threats in Australia of ongoing habitat destruction, invasive species, and climate change-related impacts.

2. **What do you think will increase community support for actions to prevent species extinctions?**

Increasing community support for actions to prevent species extinctions can be achieved with clear public messaging that Australia's unique biodiversity is imperilled by actions including habitat destruction, the introduction of invasive species, and the dispossession of First Nations Peoples' land and sea Country. In addition, the Australian Government needs to prioritise the recovery of species, through the actions outlined above.

3. **Are you (or your organisation) taking action to contribute to the target, if so, what contributions are you making and which enablers are you using?**

WWF-Australia is highly active in its work to halt and reverse the current trajectory of Australia's threatened species. We work with First Nations organisations on culturally important species, which are often also Australian Government-identified threatened species, to support the implementation of actions that mitigate threats and enhance resilience. We also work with businesses to support more sustainable practices that have fewer impacts on biodiversity.

ENABLERS

Enabler 1: Mainstreaming biodiversity considerations into government and business decision-making, including in financing, policies, regulations and planning processes

1. **What are the current barriers, and potential solutions, to mainstreaming biodiversity considerations into decision-making across government, financial institutions and business?**
2. **What are the solutions and how can these be implemented across Australia's priority areas?**
3. **What would encourage you (or your organisation) to increase your investment in nature?**

The value of biodiversity must be adequately addressed and considered when making financial and business decisions. Under the status quo, nature is valued at zero. Whilst there may be rules and regulations to try to inhibit or stop nature loss, the action incentives for investors and businesses to invest in nature is limited. Mandatory reporting of natural capital impacts from investment decisions should become mainstreamed.

However, unless changes (improvements) in natural capital have financial and cashflow benefit, there will remain limited incentive for financial institutions and companies to invest. Given the public benefit improvements in natural capital provided through cleaner air and water, cashflow benefits should come from financial incentives from government. This includes tax and subsidy. The scale of incentives through tax and subsidy should be scaled based on the significance and importance of the natural capital being managed and improved.

Enabler 2: Ensuring environmental data and information is widely accessible and supports planning

1. **What are the current barriers to ensuring environmental data and information is widely accessible, and supports biodiversity protection planning?**

Australia currently has a lack of high quality, frequently updated, continental-scale datasets on biodiversity and threatening processes, and in some instances, these datasets do not even exist. Many environmental datasets are generated and held by state and territory governments using variable data collection and analysis methods. In addition, data is often collected and held by researchers and land managers and is not made available for broader aggregation and analysis. Where datasets are available, they are difficult to consistently aggregate across jurisdictional boundaries, which does not support larger scale biodiversity protection and land use planning, particularly for species with distributions crossing state and territory borders.

Consistent high-quality, continental-scale environmental data is urgently needed to enable effective environmental regulation by the Australian Government, to accurately track whether Australia is meeting its obligations under international agreements, and to enable effective regional planning that considers cumulative impacts on biodiversity.

2. **To effectively assess, disclose, and reduce biodiversity risks, what specific data do businesses need from regulators to overcome data limitations?**

Accurate, timely and continental-scale datasets on forest, natural ecosystems, deforestation, conversion and forest restoration, including clear, consistent definitions, are essential to enable businesses to assess the cumulative impacts of development on both biodiversity and carbon emissions, and to allow Australian businesses access to international markets that require evidence of deforestation status. For example, the European Union Deforestation Regulation introduced in 2023 prevents companies from selling commodities linked with deforestation in the European market. These datasets are essential for administration of an effective carbon market, and to track progress toward Australia's biodiversity and carbon emissions targets under international agreements.

Accurate and timely information on Matters of National Environment Significance, including threatened species and threatened ecological communities, is essential for businesses to assess, disclose, and reduce biodiversity risks. This includes information on distribution and occurrence, condition and trends, areas of critical habitat, current and likely threats, and required management actions for recovery. This must be underpinned by a process that enables regular assessment and updating of threat status and required management actions based on new information, and where species taxonomy is kept up-to-date to allow integration between data sources. The sensitivity of data must be considered when making it available. Potential perverse outcomes from the public release of environmental data include collection of threatened species from identified locations, and pre-emptive illegal clearing of areas potentially designated as threatened species habitat.

Guidelines are required on appropriate survey techniques for collecting data on threatened species and their habitat, and identifying and assessing the condition of threatened ecological communities. These guidelines must outline the

amount of survey effort required to establish that a threatened species or ecological community is not present at a site (accompanied by clear decision rules – see point below). To have the largest impact, these guidelines should be broadly accessible, i.e., they should not require a science degree to interpret and follow. This would enable use by researchers, land managers, citizen scientists, and ranger groups so that all on-ground data is collected in a transparent, repeatable, consistent way and can be easily collated and interpreted by others. Clear consistent protocols for on-ground biodiversity survey techniques are also needed to underpin an effective Nature Repair Market. Again, transparent, repeatable, and consistent survey methods are essential for demonstrating concrete positive outcomes of interventions, which will be particularly important when aiming to monetise and trade these outcomes across different regulatory frameworks.

Finally, environmental datasets must include explicit measures of uncertainty, accompanied by clear decision rules for assessing and interpreting uncertain data when making regulatory and policy decisions. A risk-averse approach would be most appropriate, and would aim to minimise the risk of negative outcomes for biodiversity given uncertainty in environmental data.

3. **What are the solutions and how can these be implemented across Australia's priority areas?**

Ongoing investment is needed to generate and maintain high quality, up-to-date data sets on biodiversity, including Matters of National Environmental Significance, and threats to biodiversity, such as deforestation and land conversion. This data needs to be generated or synthesised at the continental scale, with a commitment to update datasets at frequent, regular intervals.

To leverage on-ground environmental data that is already being collected across the country, national infrastructure for storage, collation, and interpretation of this data is required. This would allow state and territory governments, NGOs, researchers, land managers, rangers and citizen scientists to contribute data to a single location where it can be synthesised to get current information on species and community distribution, occupancy, condition and trends.

While the Atlas of Living Australia provides an excellent collation of species presence records across Australia, there is a wealth of more sophisticated environmental survey data being collected across the country that could be collated into continental datasets. Collection of complex on-ground environmental data will continue to increase with the increased use of emerging technologies such as sensor cameras, drones, acoustic recorders, and environmental DNA.

Indigenous governance and use of environmental data must be respected (e.g., through the CARE principles for Indigenous Data Governance), as fundamental to any data system and infrastructure. Distillation and communication of high-level environmental data to the Australian public is an engaging and scientifically accurate way to inform them of the current state of Australia's biodiversity, helping to empower them as active stewards of nature.

4. **Are you (or your organisation) taking action to contribute to this driver, if so, what contributions are you making?**

Since 2019, WWF-Australia has been partnering with the Wentworth Group of Concerned Scientists and remote sensing experts on a project aiming to produce a high-quality national-scale spatial dataset on deforestation rates across Australia. This project pilots artificial intelligence to advance a national vegetation change monitoring standard, methodology, and spatial map.

WWF-Australia partnered with the Environmental Defenders Office (EDO) to identify and map areas of critical habitat for threatened species in priority unburnt areas of eastern and southern Australia. Identification of areas of habitat critical to the survival of a species is essential data needed to protect and manage species into the future. However, the EDO investigation found that existing legal provisions for critical habitat in NSW, Queensland, and Victorian law were underused and ineffective in delivering responsive, robust protection. The upcoming report and case studies

outline the key reforms needed to ensure that the identification, protection, and management of critical habitat becomes a key element of biodiversity conservation efforts in Australia.

WWF-Australia produces several scorecards aiming to communicate and engage the public with high-level environmental data. This includes:

- The Threatened Species Report Card. First launched on Threatened Species Day in September 2022, the Threatened Species Report Card distils key data on Australia's progress in recovering federally listed threatened species into an accessible report card format. The report card captures the major building blocks of species recovery including funding, recovery planning, habitat protection, threat status improvement, and persistence. The 2022 report card was published in a peer-reviewed scientific article,[20] with a simplified version available at wwf.org.au/mybackyard, a website that has had 103,000 page views.
- The Trees Scorecard. First launched in June 2023, the Trees Scorecard presents an overview of how state, territories and federal governments perform with regards to tree protection and restoration. Each government was assessed against 11 indicators, through both quantitative analysis of national-scale environmental data, and qualitative analysis of policies, regulatory frameworks, and monitoring and enforcement. The technical report is available through the WWF-Australia website.[21]

WWF-Australia is engaging with the Australian Research Data Commons (ARDC) Planet RDC,[22] which aims to provide national-scale data infrastructure for environmental and earth science researchers, policy makers, and decision makers. WWF-Australia is a potential contributor of machine observation data (data from sensor cameras, drones, and acoustic recorders) and an end user of synthesised data for decision-making.

Enabler 3: Ensuring equitable representation and participation in decisions relating to nature, particularly for First Nations peoples

1. **What are the barriers for ensuring all Australians have equal representation and participation in discussions and decisions relating to nature?**

First Nations people continue to experience disadvantage and a lack of respect and value of their knowledge systems, which can lead to a distrust of government. Recognition of First Nations rights and authority on land and sea Country of Australia is crucial to ensure that all Australians have equal representation and participation in discussions and decisions relating to nature. More broadly, government systems and processes need to continually strive to meet their responsibilities of being in service to First Nation communities, with a strong willingness and commitment to change. Service delivery will continue to fall short until a rights and self-determination agenda is mainstreamed across all levels of government.

2. **What are the solutions to these barriers and how can these be implemented across Australia's priority areas?**

The solutions to these barriers include better Indigenous led co-design of the entire process: from conception, implementation, governance, and evaluation of the impact and social returns on investment (more detail on this is provided in the response to Discussion Question 3). In addition, the Australian Government should invest in grassroots Indigenous community-led solutions, with acceptance that failure may occur as part of the learning process, as solving the current challenges facing nature and, more broadly, the impacts of colonisation on Indigenous Australians, is deeply complex.

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[20] Ward, M. et. al. (2024) 'A report card to effectively communicate threatened species recovery', One Earth 7, available at: https://doi.org/10.1016/j.oneear.2023.12.009

[21] WWF-Australia Technical Report, Trees Scorecard, available at: https://assets.wwf.org.au/image/upload/f_pdf/UPDATED_WWF_Trees_SCorecard_technical_report?_a=ATO2Ba20

[22] https://ardc.edu.au/planet-research-data-commons/

3. **What are the barriers for First Nations people to be actively involved in, participate and lead conservation efforts?**

There has been significant return of Country since the Mabo Decision, with more than 50% of Australia (land and water) under some form of Indigenous tenure or title. However, Indigenous groups have seen limited benefit from the return of Country and have remained excluded from and/or not consulted on many of the conservation activities taken on their Country.

While the Caring for Country movement and the associated funding for Rangers has arguably been one of the most successful activities for Indigenous advancement, particularly in remote parts of Australia, many Aboriginal Corporations and Prescribed Body Corporates (PBCs) continue to lack access to the resources required to participate and lead conservation efforts. PBCs currently receive a very small amount from the Australian Government to administer Native Title. To allow these organisations to lead in conservation efforts, significantly greater funding must be provided, particularly for resourcing such as staffing to undertake administrative activities.

Further, opportunities should be sought to transfer land currently held by the Commonwealth and the states back to management by Traditional Owners. For example, the transfer of state forests to Indigenous Groups for conservation management as an Indigenous Protected Area (IPA). However, transfers must be done in a way that ensures they will be an asset, rather than a liability, for Indigenous groups. This requires detailed planning, led by Indigenous groups, on how to make management of IPAs and conservation activities financially feasible, and which considers what capacity and resources will be needed to lead conservation efforts. The Government needs to ensure adequate resources are made available and negotiation is undertaken in good faith.

4. **Are you (or your organisation) taking action to contribute to this driver, if so, what contributions are you making?**

In 2017, WWF-Australia supported the establishment of the Women Rangers Environmental Network (WREN), providing opportunities for women rangers across Australia to connect, share knowledge and strengthen their ability to take action. The WREN program has focused on establishing, linking, and expanding hubs extending across Australia to connect nearly 500 women committed to connecting, collaborating and protecting Country.

WWF-Australia also supports Indigenous Rangers healing Country by reintroducing cultural burning as a traditional Aboriginal land management practice. WWF-Australia's Indigenous Engagement team continues to work with Indigenous leaders, communities and land managers to support the Indigenous-led revitalisation of cultural fire management across our landscapes.[23]

We are strengthening existing relationships and developing new connections with nature-focussed Indigenous organisations on Country. WWF-Australia proudly works together with mob to implement tailored, community-led approaches. This work enhances the capacity of Indigenous-led organisations, and removes barriers commonly faced by cultural fire practitioners. Guided by Indigenous leaders, our support has been designed to prioritise the needs of the individual communities we work with.

[23] https://www.wwf.org.au/news/blogs/fighting-fire-with-fire-in-the-kimberley

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