



AUSTRALIA

SUBMISSION

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WWF-AUSTRALIA SUBMISSION TO *IMPLEMENTING AUSTRALIA'S STRATEGY FOR NATURE 2024-30*

World Wide Fund for Nature-Australia (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 welcomes the opportunity to provide a submission on the implementation of Australia's Strategy for Nature 2024-30. The submission is set out in two parts. Part A makes comment on the implementation plan overall and recommends some changes to structure, content and process. Part B addresses the consultation questions in the Discussion Paper for the various targets and enablers as well as the monitoring and reporting framework.

Part A: Overall Implementation Plan comments

The nature and climate crises

The context for this submission is a worsening nature crisis, globally and domestically, accentuated by a global climate crisis. Climate change is accelerating nature decline, and the ongoing destruction of nature is accelerating the climate crisis. These two intertwined challenges are two of the biggest risks facing humanity¹, and their negative consequences are being felt everywhere across the economy, society and in peoples' everyday lives. Within Australia a steady stream of species and ecological communities are being added to the threatened species lists annually – 163 species added since 2022 - bringing the total to more than 2,200 species and communities at threat of extinction. We continue to clear native habitats at an alarming rate: every 2 minutes treed habitat equivalent in area to a football field is bulldozed. Invasive species (plants and animals), arguably the biggest cause of species extinction across Australia, continue to wreak havoc, and we continually miss critical opportunities to stop new pest outbreaks before they become established. The 2021 State of the Environment report which painted a dire picture should have been a wake-up call, but responses have been piecemeal and weak.

The hopeful response

The Global Biodiversity Framework (GBF) adopted by 196 countries in 2022 (including Australia) provides real hope, with its establishment of 23 global targets for action to 2030². These targets are designed to give effect to the Nature Positive goal, a global societal goal defined as *Halt and Reverse Nature Loss by 2030 against a 2020 baseline, and achieve full recovery by 2050*³. Each signatory to the GBF, including Australia, committed to preparing a National Biodiversity Strategy and Action Plan (NBSAP) to give effect to the GBF targets within each country.

Australia's domestic response was also hopeful. Australia's Strategy for Nature 2024-30⁴ (the Strategy) was updated to better align with the GBF and its level of ambition increased by including the GBF mission to *halt and reverse nature loss by 2030*. Following endorsement from all state and territory environment ministers, the Strategy was then submitted in October 2024 as Australia's NBSAP, just prior to COP16. While it's true the updated Strategy only included six of the GBF targets (with slight word changes for some), together with three enablers (somewhat aligned to six of the other GBF targets), it did pick up on most of the important targets to Australia, and only ignored two of the most critical targets, notably those related to reducing harmful subsidies (Target 18) and increasing nature funding (Target 19). Nonetheless the government has committed to reporting on all 23 GBF targets, even though only about half of these have been prioritised for action and it is unclear how that will be done in a meaningful way.

Following criticism from NGOs and others regarding lack of accountability in the previous strategy, the updated strategy committed to undertake implementation planning over the next 12 months. The lack of an implementation plan within (or

¹ World Economic Forum (2024) *The Global Risks Report 2024 19th Edition. Insight Report*. <https://www.weforum.org/publications/global-risks-report-2024/>

² CBD (2022) COP15: Final text of Kunming-Montreal Global Biodiversity Framework, CBD/COP/DEC/15/4. Decision 15/4: <https://www.cbd.int/decisions/cop?m=cop-15>

³ Nature Positive Initiative <https://www.naturepositive.org/app/uploads/2024/02/The-Definition-of-Nature-Positive.pdf>

⁴ <https://www.dceew.gov.au/sites/default/files/documents/australias-strategy-for-nature-2024-2030.pdf>

accompanying) the actual NBSAP brought further criticism to Australia's NBSAP⁵, but the commitment to develop this held out promise that the missing "Action Plan" part of NBSAP may now actually be prepared.

Apart from the Strategy itself, we also acknowledge the positive work of the Australian Government in progressing towards some of the targets, mostly focussed on the 30x30 target. This includes the Roadmap for 30x30 on land, the major additions to marine protected areas with a commitment to further protect no-take zones, the Other Effective Area-based Conservation Measures framework, and the \$250 Australian Bushland program commenced July this year. In addition, steps to implement the Nature Repair Market, which has potential to assist with several targets, are continuing, as is work to reform Australia's nature laws (relevant to Target 1 of the GBF).

The disappointing reality

We recognise these tools and plans could make important contributions to improving our biodiversity. However, they are not sufficient to deliver the action that Australia needs now, and action on most targets is not progressed.

Fundamentally we are still waiting for a clear plan for action to deliver Australia's commitments to the Global Biodiversity Framework (GBF). We have written to previous and current Environment Ministers in 2024 and 2025, and made several direct representations to the Department, encouraging Government leadership and ambition, facilitating collaboration and driving delivery through funding.

We welcomed the commitment set out in the Strategy to undertake implementation planning over the next 12 months even though this is too slow - it is now three years since the Global Biodiversity Framework was agreed in Montreal, and only a little over four years until 2030. Timely implementation planning is crucial to reflect the urgency of the situation.

We have argued previously and still insist that what is needed are two things:

- Greater specificity, including interpretation of the targets, and indicators and baselines to measure progress, so we have a clear understanding of what we are aiming to achieve.
- A clear delivery pathway for targets, through commitment to key implementation activities and funding needed to deliver them.

This should be the role of the implementation plan for Australia's Strategy for Nature. But the approach being consulted on does not do this. Instead, what is proposed appears to be a high level and unaccountable statement, reflecting work already underway, and certainly not a plan for action.

In fact, there appears to have been very little additional work on implementation planning since the Strategy was released in October 2024. For example, in relation to Target 2 (landscape restoration), the two critical first steps identified in the Strategy - identifying priority degraded landscapes and defining key terms for restoration – have been rolled over as priorities in the Discussion Paper which has re-labelled them as "outcomes" to inform the targets. This is despite the Wentworth Group and others having done some very practical work on this already⁶. We simply need to do better and move faster.

⁵ https://wwf.panda.org/act/nbsap_tracker_check_your_countrys_nature_progress/

⁶ Mappin et al (2021). 'The costs and benefits of restoring a continent's terrestrial ecosystems', Journal of Applied Ecology. Vol 59, Issue 2.

Fundamental changes to implementation plan needed

The implementation plan for the Strategy should include:

- A theory of change, including outcomes and intermediate outcomes, targets and activities, that all maps up to “halting biodiversity loss by 2030”.
- Clearly described implementation activities and milestones, beyond existing work underway, that will be necessary to achieve the targets.
- Identification of responsibilities for delivery of the implementation activities, including respective roles of the Australian Government and State and Territory governments. Ideally this could be constructed through an engagement process with governments, business, First Nations groups, NGOs and others resulting in agreed, shared responsibilities. Alternatively, the “government” version of the implementation plan could identify what roles and activities governments are committing to, who they are working in partnership with, and identifying the gaps that it expects other organisations to fill.
- A commitment to evaluation and regular, public reporting on progress against the targets.

There are many useful examples of implementation plans that set out clear implementation activities, responsibilities and delivery partners, timing, reporting and evaluation, including [this one](#) from Victoria for example. This could be a useful model to consider for the implementation plan for Australia’s Strategy for Nature.

Cost estimates as a starting point for nature financing

We strongly recommend that cost estimates for the activities needed to achieve each of the targets (at least for the on-ground targets) are provided, either in the implementation plan or in an accompanying Biodiversity Finance Plan. Nature funding is the single biggest impediment to delivery of the targets and it is unfortunate that the Strategy omitted Target 19 which is about increasing nature finance, when other countries are addressing this and it is so fundamental to enabling progress. WWF and other groups have been calling for allocation of at least 1% of the federal budget annually to nature protection⁷, given the chronic underspending in nature and ongoing nature loss (current spending is around 0.1% of the annual budget which equates to approx. \$0.7bil/yr⁸.) One percent of the budget is not everything needed to do halt biodiversity loss and would need to be complemented by private investment, but would set us up on a more realistic pathway to do this.

The work to increase nature finance, perhaps through development of a national Biodiversity Finance Plan, goes hand in hand with Target 18 of the GBF (also ignored in the Strategy) which aims to reduce harmful subsidies. We know from work undertaken by the Biodiversity Council that reducing or removing some subsidies that are very harmful to nature could free up billions of dollars annually⁹. So quite simply improving one problem (subsidizing activities destroying nature) might solve the other (freeing up resources to protect nature). WWF recommends an action in the implementation plan to develop a pathway to reduce these subsidies and transition them toward nature repair and nature-positive business practices. This could be commenced in the first instance by asking the Productivity Commission to identify and assess the monetary value and impact of nature negative subsidies.

⁷ WWF (2025). Towards nature positive: WWF Policy asks for the next Australian Government. https://assets.wwf.org.au/image/upload/f_pdf/NaturePositive2025_FINAL_web

⁸ Cyan Ventures (2024). The Price of Nature: Analysis of government spending on biodiversity <https://30by30.org.au/blog/2024/05/27/the-price-of-nature/>

⁹ Biodiversity Council (2024). Identifying and assessing subsidies harmful to biodiversity in Australia. Oct 2024. Report. Biodiversity Council. Melbourne, Australia.

The implementation process is a key opportunity to identify and socialise the costs of delivering the on-ground targets. The plan (or an associated Biodiversity Finance Plan) could identify key areas of future public and private investment needed to start closing the biodiversity funding gap, by indicating the resourcing that will be contributed to each target by governments (state and federal), the funding gaps that will need to be progressively filled and provide an invitation to business, NGOs, philanthropists and others to work with governments to help fill these. This is not a commitment for government to fund the delivery of the whole Strategy, as we all recognise that this is a shared responsibility.

What's more for several of the on-ground targets, there are useful estimates of the costs needed for various targets already set out in the scientific literature. For example WWF has publicly argued for¹⁰:

- Target 2: approx. \$2bn/yr to restore Australia's degraded landscapes to help nature, climate and agriculture based on Mappin et al 2021¹¹;
- Target 3: approx. \$2bn/yr to protect and manage the "best" 30% of Australia's public and private land, including within Indigenous Protected Areas (IPAs) based on Fitzsimons et al 2023¹²;
- Target 4: \$2-2.5 bil/yr to stop species extinctions by tackling invasive species and other threats based on Wintle et al 2019¹³.

This is a prime example of where perfect should not be the enemy of good. We know that these are just estimates, and come with some assumptions, but they are credible and transparent, and enable us to get on with the job of protecting and recovering nature, rather than spending years on calculating costs precisely.

Engagement is needed to build a coalition of the willing

What is most frustrating and disappointing is that we (and several NGO partners) have repeatedly offered to help the Department and to establish a more collaborative approach. The implementation of the Strategy is such an important opportunity to stop biodiversity loss – in fact there is no other national approach - but it needs buy-in from a broader cross section of stakeholders, not just governments, and it needs funding commensurate with the scale of the task. Nature loss is a shared problem across the whole of society, and one which government, business and civil society needs to be working on together.

Unfortunately these offers to collaborate have been rejected and it has been made clear to us in discussions with the Department that this is a government plan – apparently with some buy-in from state governments as well – and that the rest of us should do our own. Yet we know that other countries are having great engagement with stakeholders, civil society and building commitments together with great results.

Harnessing this shared enthusiasm, knowledge and resourcing is the only way to tackle this massive task. We strongly encourage the Government to be more open to meaningful engagement with interested stakeholders, to discuss shared solutions to these shared problems. We want to help and we want this to work because it is so important. We are happy to take a bit more time in this implementation planning phase to get this right and to build in this engagement step as it is has great value. Asking a few survey questions is simply not good enough.

¹⁰ WWF (2025). Towards nature positive: WWF Policy asks for the next Australian Government.

https://assets.wwf.org.au/image/upload/f_pdf/NaturePositive2025_FINAL_web

¹¹ Mappin et al (2021). 'The costs and benefits of restoring a continent's terrestrial ecosystems', *Journal of Applied Ecology*. Vol 59, Issue 2.

¹² Fitzsimons J, Picone A, Partridge T, Cornish M. 2023, 'Protecting Australia's Nature: Pathways to protecting 30 per cent of land by 2030', The Nature Conservancy, WWF-Australia, the Australian Land Conservation Alliance and the Pew Charitable Trusts

¹³ Wintle et al. 2019, 'Spending to save: What will it cost to halt Australia's extinction crisis?', *Conservation Letters*

Part B: Comments on specific targets and enablers

This section addresses some of the consultation questions included in the discussion paper under relevant targets, enablers and monitoring framework.

The consultation questions for the targets and enablers were:

1. *Do the 'outcomes' in the discussion paper represent the main areas where action should be focused to achieve this target or enabler of change?*
 - a. *If not, what additional outcomes will support us to achieve this target or enabler of change?*
2. *Are there any barriers to achieving this target or enabler of change?*
 - a. *If yes, what solutions do you suggest for overcoming these barriers?*
3. *Are you or your organisation already taking action to contribute to achieving this target or enabler of change?*
 - a. *If yes, please provide further information on the action you are taking.*

Target: Protect and conserve 30% of Australia's landmass and 30% of Australia's marine areas by 2030

The outcomes for this Target are quite comprehensive. However, Outcome 2 could more explicitly state the need to achieve at least minimum levels of protection to under-represented ecosystem types, notably in over-cleared landscapes. This is the great challenge for the National Reserve System, and remains stubbornly hard and expensive to address. More explicit commitments to addressing this gap could assist. For example, Outcome 2 could be amended to "Protected and conserved areas on land are well connected, *achieve science-based ecological representativeness thresholds* and include areas of particular importance for biodiversity"

An additional Outcome could capture the need to restore degraded landscapes to enable them to also be protected. This reflects the reality that in over-cleared landscapes, <10% of major vegetation groups remain for many IBRA regions, thus preventing achieving minimum levels of representativeness. It would also help avoid the risk of addressing protection and restoration targets in isolation.

Target: Priority degraded areas are under effective restoration by 2030

Outcome 1 should lead to adoption of SMARTA targets, with quantified targets for restoration of priority degraded areas. The GBF expression of this target is:

"Ensure that by 2030 at least 30 per cent 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, ecological integrity and connectivity."

As a result of the Strategy expressing this target without the quantitative "30%" element, it establishes a barrier to achievement, as it undermines clarity and ambition. This needs to be addressed in the implementation plan and through implementation activities.

A national restoration plan should be developed, that will include SMARTA restoration targets for identified habitats in degraded landscapes and seascapes, and approved by commonwealth, state and territory governments.

Ecosystem protection is supported by the National Reserve System, CAR reserve system targets, CAPAD reporting, National Parks-type laws and covenanting programs. In contrast, ecosystem restoration lacks this level of institutional, technical and legislative support, reporting and ambition.

The EU Restoration Regulation (2024) establishes quantitative restoration targets of 30% by 2030, 60% by 2040 and 90% by 2050 of degraded areas of listed habitat types (see Article 4 and Annex I).¹⁴ The regulation requires Member States develop national restoration plans, with monitoring and reporting requirements. This approach provides a useful model for Australia to provide greater clarity and accountability regarding implementation of this Target.

The level of ambition, specificity, and institutional and regulatory support that underpins and drives ecosystem protection should be used as a benchmark to similarly drive ecosystem restoration.

The three outcomes are all relevant and urgent – defining (and mapping) priority degraded landscapes should have already been undertaken as this is holding back coordinated planning and investment. What's more, as identified in Part A, there is credible existing work that could be used for this (e.g. Mappin et al 2021). Defining effective restoration and identifying enabling work that is needed to support landscape restoration are also important, noting our practical suggestions above. However these are just practical inputs, neither of these three outcomes are at the requisite level of ambition for the target.

It is suggested that the three outcomes be bundled together into a single outcome based around enabling work, and an additional outcome be created that picks up the ideas above about a national restoration plan. That can then speak to planning and coordination, engagement, and development of quantitative targets for states or regions.

In addition, as indicated in Part A, the estimated cost of delivering this target needs to be included. The estimated cost together with these more focussed and ambitious outcomes and activities, can then be used to generate increased private and public investment into this high priority and widely supported action that will help to address both nature and climate crises.

Target: Eradicate or control invasive species in priority landscapes and further minimise their introduction by 2030

The four proposed outcomes are sensible and are supported, including the focus on landscape scale actions in priority areas (although it's unclear how priority landscapes will be determined). It is suggested that the need (and opportunity) to eradicate invasive species from priority islands should also be included.

However a bigger issue that is missing is consideration of how to increase funding for these four areas, particularly Outcome 2 which focusses on landscapes and on-ground action.

Invasive species control is the most critical and urgent threat for the majority of our threatened species. As a result of almost 250 years of poor management, pest plant and animal species are now firmly established and many of these can

¹⁴ 2024/1991 REGULATION (EU) 2024/1991 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869, available at https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401991

never now be eradicated. Control to reduce levels of impact, or potentially eradicate, from key areas requires ongoing, sustained funding at a level many times greater than present. The implementation plan is an opportunity to address this key issue, as business as usual will mean the extinction of many more species.

As for the other targets, funding is not solely a Commonwealth responsibility – investment needs to come from all sources (private and public), and recognise the major role played by states in the management of invasive species. This is an opportunity to coordinate across all states and territories, and to increase the level of ambition to a consistent level, commensurate with the level of invasive species threats posed. We know that sustained funding for invasive species across priority landscapes to reduce threat levels so that extinction risk for threatened species is significantly reduced will require many billions of dollars a year.

It is recommended that – as for the other targets an estimate of cost be provided for each of the outcome areas. It is also recommended that a separate outcome be constructed that focusses on mechanisms to progressively increase and sustain funding for invasive species control in priority landscapes. Alternatively Outcome 2 could be rewritten to include this. To be clear, better aligning and targeting existing resources is very important, but will not get us to the required level of control – we also need to grow the pie.

Target: No new extinctions

The two proposed outcomes – focussing on preventing the most critically endangered species going extinct and recovering threatened species over time – are ok but don't address the seriousness of the extinction crisis facing us, nor the enormity of the recovery challenge expressed in the outcome or the Strategy itself. Business as usual wont stop more extinctions. In fact as we write this submission we have learned of another new extinction within Australia, the Christmas Island shrew, declared to be extinct by the IUCN in October 2025. This demonstrates again we are failing, and this is largely due to inadequate investment.

An additional Outcome addressing the need to grow investment, collaboration and innovation in financing into threatened species management is needed. This would leverage the action *Forging stronger partnerships* in the Threatened Species Action Plan and address a key gap in capacity for threatened species conservation. For example, an Outcome 3 could provide for “Expand collaboration, investment and innovative financing to support threatened species”.

As indicated in Part A, WWF has been advocating for at least \$2 billion a year ongoing for preventing extinctions, based on Wintle *et al* 2019¹⁵ as part of our broader call for 1% of the national budget to be spent on nature conservation. Increased threatened species funding needs to include investing in coordinated and inclusive conservation planning, landscape scale management (see above under invasive species target), cultural burning and species-specific recovery actions including habitat restoration, species reintroductions and funding for threatened species recovery teams.

Target: Minimise the impact of climate change on biodiversity

The three outcomes are sensible, however we would encourage the first outcome to use the word accelerate, rather than continue so as to read “**Accelerate** Australia's efforts to mitigate climate change and deliver on Australia's net zero

¹⁵ Wintle et al. 2019, 'Spending to save: What will it cost to halt Australia's extinction crisis?', *Conservation Letters*

by 2050 target”. This would better reflect the urgency of the climate crisis and its existential and increasing threat to ecosystems and species.

Explicit inclusion of language regarding maintaining and increasing *ecosystem integrity* in Outcomes 2 or 3, or establishing an additional outcome to capture this, would more clearly address the importance of nature for both storing carbon and building resilience to climate change.¹⁶

The third outcome focused on integration of nature and climate is important and is supported. WWF recommends more could be made here of nature-based solutions, including a plan to mainstream these by embedding the principles in relevant decision making and to scale these up across the country. In addition to being often cheaper and more effective ways to tackle climate impacts, nature-based solutions can go hand in hand with inclusive conservation and are often more appropriate ways to tackle community challenges caused by climate change, in ways that respect the knowledge, rights and economic systems of First Nations people. For example, WWF has been partnering with several Aboriginal Corporations in the north-west of Australia on an Indigenous-led nature-based solution for climate using Right-Way Fire management. This will be able to verify Healthy Country outcomes, reduce emissions and capitalise on nature-based economies for northern Australian Indigenous communities.

Enabler of change: Ensure equitable representation and participation in decisions relating to nature, particularly for First Nations peoples.

The first outcome, i.e. “First Nations peoples are supported to preserve and apply Traditional Knowledge, with governance arrangements that enable culturally grounded, self-determined decision-making” is supported. Some examples of where this is being promoted are provided, but there is no indication of how this will be practically achieved overall and how the two relevant targets in the GBF (targets 22 and 23) will be reported on.

The principles embodied in the second outcome “Decision-making is informed by diverse voices, including youth, people with disabilities and people of all genders” are supported. However the text is so high level as to be meaningless. In what ways will this be achieved? We note for example from discussion with the department about EPBC reforms, the promised “Community consultation and engagement standard” that was to form part of the EPBC Act reforms appears to have been abandoned. This could be a good vehicle for ensuring diverse voices are engaged and heard prior to decisions being made that may affect them.

WWF-Australia embeds Inclusive Conservation in all that we do. We would be happy to work with the Department in the further development of the work required under this enabler and share some of our learnings. The biocultural example of using Right-Way fire above (under “Minimise the impact of climate change on biodiversity”) is a good example of this work in practice.

Enabler of change: Mainstream nature into government and business decision-making, including in financing, policies, regulations and planning processes

¹⁶ See, for example, see [IPBES-IPCC CO-SPONSORED WORKSHOP BIODIVERSITY AND CLIMATE CHANGE WORKSHOP REPORT](#) and [Ecosystem integrity: A conservation imperative | IUCN World Conservation Congress](#)

WWF strongly support the intent of this enabler and support the three outcomes proposed. However as explained in Part A and elsewhere in this submission, this enabler deserves a more action focussed outline plan – clear activities, responsibilities and timelines.

This “mainstreaming” enabler– which includes at least two of the targets of the GBF (14 and 15, and probably 16) is arguably the most strategic and important area of work with potential to shift the dial on nature protection and stopping biodiversity loss. It firmly links to the priority in WWF’s new Global Roadmap to “Elevate Nature”. And in so doing it has the potential to influence the more transformational changes needed to:

- Substantially increase (by redirecting) financial flows into nature;
- Reduce the damage that is done to nature everyday through our economic settings, drivers and poor choices; and
- Create new, innovative and forward-looking policies that help nature and people flourish, because central Governments and their constituents understand the risks of not doing so and fundamentally want it to happen.

It is pleasing that the three outcomes proposed cover government, business and the general public. Business has already shown its appetite for reform, when the right signals are provided by government. There are already many positive initiatives and changes occurring within the business sector, including those related to promoting the Taskforce for Nature-related Financial Disclosures (TNFD), although there is of course a long way to go and the need for further incentive from government. For example we recommend the implementation plan include an action that leads to nature disclosures becoming mandatory for large Australian businesses and financial institutions in the next three years. Business is already anticipating this.

There is also a real opportunity for government to do more itself, for example by looking inwardly at biodiversity loss as a risk to government delivery. This could consider which portfolios are more exposed to nature loss and which portfolios are contributing more to the problem, as well as where the opportunities to mitigate and improve lie. This is the journey that a lot of businesses have commenced, but needs to be complemented by similar work by governments. Just as business has started changing what they do as they understand more about these issues, government can do the same. The level of complementary and positive action that could then be enabled across government and business to stop biodiversity loss and start recovering nature could be immense.

WWF would like to support the work that DCCEEW and other agencies are doing to increase the mainstreaming of nature across government and business, including assisting with development of an action plan for this critical area of work.

Enabler of change: Ensure environmental data and information are widely accessible and support decision-making

WWF supports this important enabler and the three outcomes proposed. We encourage government to commit the requisite level of resources to implement this critical work.

Monitoring, evaluation and reporting

The consultation questions in the discussion paper were:

1. *Would you like to provide feedback on Australia's approach to monitoring, evaluation and reporting under the Global Biodiversity Framework (GBF)?*
 - a. *If yes, please list the areas requiring particular attention to improve Australia's ability to monitor and report on progress (e.g. data availability, data consistency, collection methods, use of new emerging technologies etc.)?*

WWF strongly recommends use of the GBF Monitoring Framework adopted at COP 16.2 to guide the development of Australia's own monitoring, evaluation and reporting framework. It's pleasing to see that headline and binary indicators will be used "to the greatest extent possible" to quote the previous Environment Minister. While we recognise slight deviations may be necessary to serve Australian needs its important these do not undermine the ability of the framework to enable consistent global reporting.

WWF also recommends the February 2026 first report on GBF progress include reporting on all 23 GBF targets, or at the very least some consistent narrative and methodology for every target, even if actual data and reporting is not yet available. We are concerned that given the next reporting is 2029, that is too late to commence reporting on some of the other targets, in particular the two "missing" targets highlighted in part A, namely Target 18 (reducing harmful subsidies) and Target 19 (increasing nature funding). These two missing targets are critical to achieving real progress on the GBF and the Strategy and we strongly recommend these be included in the February 2026 report.

In addition, we make some comment on forest cover change assessment, which may be relevant to the monitoring framework and also to Environment Information Australia. Data on forest cover change is based on estimates of land carbon emissions and sequestration generated for reporting under the UNFCCC, and thus uses forest definitions for carbon reporting and FullCAM modelling, rather than for-purpose reporting on deforestation and reforestation. This likely leads to under-reporting of forest loss, as evidenced by lower estimates of forest loss reported in the National Inventory Reports (NIR) compared to SLATS woody vegetation change reporting. Assumptions upon which forest loss and gain used to generate land carbon emissions for reporting in NIRs are not transparent nor subject to independent external per review in the scientific literature. This ongoing issue continues to undermine confidence in Australia's reporting on forest loss.

In the context of protection and restoration of nature, Australia needs highly accurate, timely and transparent reporting on forest cover change to enable reporting against commitments under the GBF and First Global Stocktake. The work undertaken by ANU (and supported by WWF) to develop the Vegetation Monitoring and Assessment Program (VMAP) has the potential to do this forest change analysis consistently and effectively. We recommend cooperation between Environment Information Australia and the ANU VMAP program to increase its efficacy.

Conclusion

Thank you again for the opportunity to contribute to this important process and we look forward to further opportunities to work together on the implementation of Australia's Strategy for Nature. Halting biodiversity loss is a massive challenge, but one of our most critical tasks to tackle. With the Strategy in place we need an ambitious and accountable action plan,

built through collaboration and buy-in from a broad range of stakeholders. We firmly believe that the only way to achieve this critical mission of halting biodiversity loss, and to do so in a way that respects people, is to work together.

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