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3 August 2017

Dear Sir/Madam,

Thank you for the opportunity to make a submission in relation the Australian Treasury, *Tax Deductible Gift Recipient Reform Opportunities Discussion Paper,* 15 June 2017 (the '**Discussion Paper**').

WWF is the world's largest conservation organisation. Its mission is *to stop the degradation of the planet's natural environment and to build a future in which people live in harmony with nature, by conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable and promoting the reduction of pollution and wasteful consumption.*

This submission addresses issues 4, 9 and 12 of the *Discussion Paper*. The remaining issues in the Discussion Paper are addressed by doing so.

Discussion Paper issue	WWF submission
4. Should the ACNC require additional information from all registered charities about their advocacy activities?	The ACNC should not require additional information from registered charities about their advocacy activities, for the following reasons: • There is no evidence of misconduct in relation to advocacy activities by registered charities. • There is no evidence that the existing regulatory system with respect to advocacy by registered charities (the Australian Charities and Not for Profits Commission and the Australian Taxation Office) is inadequate. • The Australian Government requires policy makers to show that additional regulation will '*offer an overall net benefit*' and/or that the '*cost burden of new regulation [is] fully offset by reductions in existing regulatory burden*' and/or that it has been '*the subject of a Regulation Impact Statement*':

Discussion Paper issue	WWF submission
	Australian Government (2017), *Cutting red tape: The Australian Government online resource for regulation reform: Ten principles for Australian Government policy makers*: https://www.cuttingredtape.gov.au/handbook/ten-principles-australian-government-policy-makers (accessed 31/7/2017). The Discussion Paper does not address these issues.
9. What are stakeholders' views on the introduction of a formal rolling review program and the proposals to require DGRs to make annual certifications? Are there other approaches that could be considered?	A formal rolling review program and annual certifications should not be introduced, for the following reasons: • There is no evidence that the existing regulatory system (the Australian Charities and Not for Profits Commission and the Australian Taxation Office) is inadequate. • There is no evidence that the introduction of a formal rolling review program and annual certifications will '*offer an overall net benefit*' and/or that the '*cost burden of new regulation [is] fully offset by reductions in existing regulatory burden*' and/or that it has been '*the subject of a Regulation Impact Statement*': Australian Government (2017), *Cutting red tape: The Australian Government online resource for regulation reform* (referred to above).
12. Stakeholders' views are sought on requiring environmental organisations to commit no less than 25 per cent of their annual expenditure from their public fund to environmental remediation, and whether a higher limit, such as 50 per cent, should be considered?	Environmental organisations should not be required to commit 25-50 percent of their annual expenditure on environmental remediation, for the following reasons: • The requirement would cause some (perhaps many) environmental organisations, including WWF, to fail in their mission to conserve/protect the Australian environment: (a) many Australian environmental challenges are at a scale far beyond the ability of environmental organisations to remediate. Government action (that is to say – the collective action of the Australian community) is required as the environmental state and trends identified in Attachment A demonstrate. Each of the environmental state and trends is reproduced from the *Australian [Government] State of the Environment Report 2016*: https://soe.environment.gov.au/; (b) further, many environmental challenges cannot be resolved through remediation. Rather they involve large-scale (in some cases global-scale) market failures, principally the failure to price externalities (for example, greenhouse gas emissions), and/or value judgements about the relative priorities of economic, social or environmental outcomes (for example, forest conservation versus 'cleared' agricultural land) which can only be resolved through the political process;

Discussion Paper issue	WWF submission
	(c) remediation presupposes that the damage has been done. This is usually less effective (in terms of environmental outcome) and efficient (in terms of expenditure of money and time) than preventing the environmental damage in the first place. In other words, requiring use of money for environmental remediation may be a poor use of donors/taxpayers' money. • A requirement to commit 25-50 percent of annual expenditure to environmental remediation would reduce environmental organisations' ability to engage in advocacy for environmental protection (because some of the financial resources to do so would be diverted into rehabilitation). As Attachment A demonstrates, environmental protection advocacy is the only way to solve many Australian environmental challenges. • There is no evidence that the existing regulatory system (the Australian Charities and Not for Profits Commission and the Australian Taxation Office) is inadequate. • The Discussion Paper does not provide evidence that the 'environmental remediation' commitment will '*offer an overall net benefit*' and/or that the '*cost burden of new regulation [is] fully offset by reductions in existing regulatory burden*' and/or that it has been '*the subject of a Regulation Impact Statement*': Australian Government (2017), *Cutting red tape: The Australian Government online resource for regulation reform* (referred to above).

Thank you for the opportunity to make submissions in relation to the Discussion Paper.

Please do not hesitate to contact me on ptoni@wwf.org.au if you have any queries.

Yours faithfully

Paul Toni

Conservation Director – Sustainable Futures

Attachment A

Environmental challenges identified in the *Australian [Government] State of the Environment Report 2016*

NOTE: '*What has changed since 2011*' reproduces text in the *Australian State of the Environment Report 2016:* https://soe.environment.gov.au/). 'State and trends' reproduces edited text in the same report. Topics are hyperlinked to relevant page of the online report.

Topics	What has changed since 2011?	State and trends	WWF submission
Overview of the state and trends of the atmosphere (climate)	*Australia's greenhouse gas emissions per person decreased from 24.1 tonnes in 2011 (DCCEE 2012) to 22.2 tonnes in 2015 (DoE 2016a), although they remain the largest of any country in the Organisation for Economic Co-operation and Development.* *The energy sector continues to dominate greenhouse gas emissions, increasing from 74 percent of net emissions in SoE 2011 to 76 percent in 2015.* *The world experienced the hottest year on record (2015) and Australia experienced its hottest year (2013).*	*The changes to Australia's climate arising from global climate change include increased average surface air temperature, increased incidence of heatwaves, decreased average rainfall in parts of the country, an increase in drought frequency and severity, sea level rise, more extreme daily rainfall events, and flooding from intense storm activity.* *The oceans absorb heat from the atmosphere, which makes them warmer. The oceans also absorb CO_2 from the atmosphere, which changes their chemistry in a process called ocean acidification. …*	Environmental remediation is not a feasible solution to climate change, which is essentially a systemic energy/agricultural/ industrial pollution issue that needs to be addressed through legislation to reduce pollution and programs to substitute clean technology for polluting ones. Advocacy for pollution legislation and clean technology substitution is the only way for environmental organisations to address climate change, both in Australia and overseas.
Overview of the state and trends of the atmosphere (air quality)	*Maximum ozone levels and levels of particulate matter less than 10 microns (PM_{10}) in size now rarely exceed limits designed to protect human health.* *However, evidence has emerged that human health impacts from air pollutants occur at far lower concentrations than previously thought.* *Regulatory controls on vehicle emissions have reduced nitrogen dioxide levels.*	*Air quality is generally good to very good in Australian urban areas. …* *However, evidence about the adverse impact of air pollution on human health has increased …, and health effects have been observed at lower pollutant concentrations than those on which the guidelines are. based. Particulate matter is a concern. …*	Air quality raises the same issues as climate change and WWF makes the same submission. Most improvements to air quality in Australia are a direct result of campaigns by environmental organisations in the 1970s and 1980s.

Topics	What has changed since 2011?	State and trends	WWF submission
Built environment	*With water restrictions easing across many regions since 2011, Australian households have been increasing their water consumption. …* *Water use by the manufacturing and commercial, and service industries has continued to decrease during the same period, by 9 and 11 percent, respectively.* *Demand for electricity and household electricity consumption have fallen because of improved energy efficiency of appliances and machinery; reduced reliance on electricity from the grid following uptake of household solar panels, which has been driven by reduced costs and taxpayer subsidies; and reduced consumption in response to an increase in electricity prices.* *Land on the fringes of major capital cities continues to be developed at the expense of agricultural land and biodiversity.*	*Australia's urban amenity is generally good. Although our urban populations are still consuming significant resources, they are using energy more efficiently than in 2011.* *Water quality in urban areas is generally good, but, in parts of regional Australia, it does not meet relevant drinking water standards.* *Air quality in urban areas is also generally good. …* *Australia's cities continue to face pressures from growing reliance on private vehicles and other transport demands more generally—all of which affect the environment and human health. …* *At the same time, our cities and towns can be important for biodiversity conservation, providing ecosystem services such as flood mitigation, water quality control and nutrient cycling. … [and] … profound benefits for human wellbeing …*	Environmental remediation is not a feasible strategy to maintain good urban amenity as this involves urban form/city design which is the preserve of local, state and national governments. Environmental remediation is not a feasible strategy to restore poor water quality (or maintain good water quality) as water supply/infrastructure involves financial expense vastly beyond the financial resources of environmental organisations. Air quality in urban areas: see *Air quality* above. Urban form/city design and/or roads for private transport and roads and rail for public transport are the underlying drivers of and/or solutions to issues of metropolitan transportation. These are either the preserve of governments or involve financial expense vastly beyond the financial resources of environmental organisations. Environmental remediation can help reintroduce biodiversity into our cities and towns at a modest-scale. However, advocacy to ensure that biodiversity is not lost in the first place (for example, by making the case against clearing trees and instead developing existing cleared land) is likely to play a much more important role.

Topics	What has changed since 2011?	State and trends	WWF submission
Overview of the state and trends of heritage	*One new Australian site (Ningaloo Coast) was added to the World Heritage List. Two sites (Kakadu and Tasmanian Wilderness) were extended, and cultural values were recognised for another (Wet Tropics of Queensland).* *Twelve new places were added to Australia's National Heritage List.* *The extent of natural heritage protected in the National Reserve System and National Representative System of Marine Protected Areas has increased.* *Some state and territory heritage registers have improved.* *In some places, there have been impacts on natural, Indigenous and/or historic heritage values, including destruction of significant sites*	*Australia's extraordinary and diverse natural and cultural heritage generally remains in good condition, despite some deterioration and emerging challenges.* *…* *A joint monitoring mission by the World Heritage Centre and the International Union for Conservation of Nature visited the Great Barrier Reef World Heritage Area in 2012 amid concerns of increasing impacts from ongoing environmental pressures …* *Australia's heritage registers list natural and cultural places at national, state and local levels, but in an inconsistent manner, and with disparate levels of resourcing and regulation* *…*	The conservation and good management of Australia's natural and cultural heritage, including the Great Barrier Reef, Tasmanian wilderness, Indigenous Protected Areas, National Reserve System and National Representative System of Marine Protected Areas require government regulatory action and funding. This in turn requires value judgements and the allocation of scarce resources that can only be resolved through the political process. Environmental remediation is not a feasible strategy to maintain Australia's heritage. Advocacy for adequate resources for Australian heritage is the only way for environmental organisations to address these issues at a national or state scale.
Overview of the state and trends of biodiversity	*The list of nationally threatened species and ecological communities has increased, with the addition of 30 new ecological communities, and 44 animal and 5 plant species.* *Two species have been listed as likely extinct: the Bramble Cay melomys (Melomys rubicola), and the Christmas Island forest skink (Emoia nativitatis). These species have not been formally reassessed under the EPBC Act.*	*Based on the information available about vegetation extent and condition, … the status of biodiversity in Australia is generally considered poor and deteriorating.* *Grazing in the extensive land-use zone of Australia is considered a major threat to biodiversity. …* *Birds show variable trends, but some groups, such as woodland-dependent species in the mallee and carnivore species in the arid zone, are in significant decline. …*	The *State of the Environment 2016* identifies the major 'pressures' on biodiversity as being Climate change, Land-use change and habitat fragmentation and degradation (particularly tree-clearing and over-grazing) and invasive species (feral animals, weeds and diseases). These pressures operate at a continental-scale. The practical response is government action in relation to climate change, government regulation and/or market based schemes to end land-use change and habitat fragmentation and degradation (particularly of tree-clearing

Topics	What has changed since 2011?	State and trends	WWF submission
	Land-clearing rates stabilised in all states and territories, except Queensland, where clearing increased.	*Very limited information is available to assess the state and trends of reptiles, amphibians and invertebrates, except for a few high-profile species.* *The condition of terrestrial habitats in Australia has been influenced by historical land clearing, degradation and fragmentation. …*	and over-grazing), government relation to prohibit or control the importation of invasive species and to control those already released into nature. Environmental remediation is not a practical response/solution to these pressures.
Overview of state and trends of land	*The effects of the millennium drought in southern Australian (2000–10, although in some areas it began as early as 1997 and ended as late as 2012) have continued to relax, and many areas are starting to recover; 2010–11 was Australia's wettest 2-year period on record.* *Dry conditions developed in Queensland again in 2013, and, by 2015, some 86.1 per cent of the state was drought declared—the highest proportion in the state's history.* *Australia's conservation estate has increased, with significant additions to the National Reserve System, largely through the addition of new Indigenous Protected Areas.* *The use of land and vegetation for carbon sequestration, carbon emissions avoidance and emissions reductions has expanded.*	*Land use: The impacts of human land use are spread unevenly across the country. Vegetation clearing is concentrated in the long-settled agricultural and coastal zones, where more than 50 percent of native vegetation has typically been cleared. …*	
		Indigenous land: Indigenous people, their land, and their cultural and natural resource management activities make core contributions to managing Australia's environment. Indigenous lands contain significant levels of biodiversity, and long-term investment in Indigenous land management programs has delivered environmental, cultural and economic benefits *… More than 50 percent of Indigenous land interests lie in very remote areas of Australia and in some of the least commercially viable lands. Indigenous communities in these remote regions face key challenges for enterprise development and employment*	Environmental remediation is not a feasible strategy to assist Indigenous people in maintaining their land, and the cultural and natural resource management activities that make a core contribution to managing Australia's environment. Rather, long-term government investment is required.

Topics	What has changed since 2011?	State and trends	WWF submission
	Although 2014–15 was a period of significant downturn, mining is still a major industry in many regions, particularly Western Australia, Queensland and New South Wales. *Soil acidification and erosion continue to be significant problems in Australia's agricultural areas, although the impacts of soil salinity have slowed.*	*Protected areas: Despite this growth, only minor progress has been made since 2011 in meeting representation targets for ecosystems and threatened species. In part, this is because most growth has been in desert bioregions, so that representation improvements have been highly localised. …* *Conservation covenants have grown rapidly on private lands in Australia, … These covenants are essential for meeting the challenge of expanding the National Reserve System to meet national goals, …*	Environmental remediation is not a feasible strategy to achieve the national and state governments' National Reserve System targets. Advocacy for environmental protections is the only way for environmental organisations to address these issues at a national or state scale.
		Agriculture and forestry: The sophistication of Australia's agricultural land management continues to increase, with ongoing reductions in the intensity of agricultural chemical use … more careful use of fertilisers in sensitive environments … more flexible approaches to grazing management … pesticide loads continue to be a cause for concern. Horticultural production, … threatened by introduced and native pests, diseases and weeds. …	Environmental remediation is not a feasible strategy to improve the sophistication of Australia's agricultural land management or control pests, diseases and weeds. Advocacy for environmental protections is the only way for environmental organisations to address these issues at a national, state or landscape scale.
		Carbon sequestration: Use of land and vegetation for carbon sequestration, carbon emissions avoidance and emissions reductions has become a mainstream interest for industries and governments; this use has recently expanded. Bio sequestration may have an impact on future rural land use and management.	Environmental remediation is not a feasible strategy to increase carbon sequestration (though environmental rehabilitation can be a by-product of a carbon sequestration market). Advocacy for a tree-carbon market is the only way for environmental organisations to address these issues at a national or state scale.

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		Mining: Expansion of these developments in areas known as 'prime agricultural land' has caused conflict because of competition for land. Enhanced regulatory oversight at state and national levels has been introduced to address concerns about competition for, and potential contamination of, water resources. Other possible adverse impacts on the environment and human health exist through, for example, hydraulic fracturing (fracking), habitat fragmentation, disruption of ecological processes and fugitive gas emissions. …. *… Shale gas, like coal-seam gas, has possible adverse effects on the environment and human health, with state regulatory regimes having a major role in risk mitigation.*	Environmental remediation is not a feasible strategy to resolve issues relating to mines, mining regulation and mining-related land use conflicts. Advocacy for environmental protections is the only way for environmental organisations to address these issues at a national, state or local scale.
		Soils: Salinity, soil carbon stocks, acidification and erosion affect soil condition and productivity in Australia. *Increases in dryland salinity appear to have been slowed by the millennium drought, although the return to wetter conditions is likely to increase the spread of salinity.* *The management of soil carbon is central to maintaining soil health and ensuring global food security, … few regions have increasing soil carbon stores. The time since vegetation clearing is a key factor determining current trends. …. The savanna landscapes of northern Australia have significant potential*	The slow rate of soil formation, and high rates of soil erosion and loss of soil carbon, mean that soil is effectively a non-renewable resource. Environmental remediation is not a feasible strategy to resolve issues of dryland salinity, loss of soil carbon, acidification and erosion. Advocacy for environmental protections is the only way for environmental organisations to address these issues at a national, state or landscape scale.

Topics	What has changed since 2011?	State and trends	WWF submission
		for increasing soil carbon stores, but this requires changes in grazing pressures and fire regimes. *Soil acidification is another challenge facing agriculture. … Soil acidity affects approximately 50 million hectares (or 50 percent) of Australia's agricultural land, and about 23 million hectares of subsoil layers, mostly in Western Australia and New South Wales …* *Current rates of soil erosion by water across large areas of Australia exceed soil formation rates, …*	
Overview of state and trends of inland Water	*There has been significant variation in surface-water and groundwater conditions, largely in response to year-on-year variations in weather and changeable climatic conditions.* *Local improvements have been seen in some water quality parameters in the Murray–Darling Basin. Basin stream flows in early 2016 were mostly around average in southern and central areas, with a mix of above and below average flows in the north.* *Agriculture, particularly irrigated agriculture, remains the greatest consumer of water. Urban water consumption has shown multiyear rises after declining or fluctuating for most of the past decade.*	*National water storage levels varied from above 80 percent in 2011 to below 50 percent in 2015. State-level variations have ranged from above 75 percent to below 45 percent for New South Wales and Tasmania, whereas South Australia's water storage has remained consistently between 80 and 100 percent.* *For the north-east and the south-east coast (New South Wales), water quality is considered poor. Similarly, the majority of sites on the south-east coast (Victoria) are in moderate to poor condition. For the south-west coast (Western Australia), the condition is very poor.* *The state and trends of ecological processes and key species populations in inland waters range from very poor across the Murray–*	Water is a scarce and non-creatable resource. Environmental remediation is not a feasible strategy to resolve issues of poor water quality, poor ecological processes and condition of key species in our inland waters, poor groundwater management and use and drainage of acid sulfate soils. Advocacy for environmental protections is the only way for environmental organisations to address these issues at a national, state or landscape scale.

Topics	What has changed since 2011?	State and trends	WWF submission
	The local water quality in the Murray–Darling Basin has noticeably improved. *New data analyses show our groundwater resources be mostly in poor condition. Although the condition of some areas remains stable, others are deteriorating.* *The functioning of ecological processes and the condition of key species in our inland waters are generally poor in areas of intensive pressure and use, and good in other areas.*	*Darling Basin, to poor to good and stable for the south-east and south-west regions, and good for most of the rest of the country.* *Groundwater systems are important for providing water resources, and are subject to the pressures of climate, development and growth. … In most cases, the condition of Australia's groundwater is poor, reflecting a long history of use. … Increases in groundwater recharge …, largely because of land-cover changes, have … produced dryland salinity.* *Drainage of acid sulfate soils has acidified local waterways and caused ecological damage, including lasting impacts on estuarine and marine-based fisheries, particularly shellfish.*	
Overview of state and trends of coasts	*Increasing human activity on the coast means that overall pressure is growing. Direct impacts have been caused by urban and agricultural developments, which are predominantly on the east, south-east and south-west coasts of Australia.* *In addition to ongoing pressure from metal and nutrient pollution, coastal waterways are threatened by new classes of pollutants. These include micro plastics and nanoparticles, which are largely unregulated and whose effects are poorly understood.*	*The condition of Australia's coastal environment is mixed, being largely good in the north-west and far north-east of the country, and largely poor in the east, south-east and south-west. In the future, parts of the tropical north coast may be threatened by planned development, if this is not well managed. …* *Marine debris (human litter) is increasingly entering coastal waterways and marine environments, where it persists and accumulates. …* *Of emerging concern are microplastics, … These enter coastal waters through sewage*	Environmental rehabilitation is not a feasible way to manage threats to the tropical north coast from development. If development is not well managed it presents threats from shipping, marine debris or microplastics. Advocacy for environmental protections is the only way for environmental organisations to address these issues at a national and state scale.

Topics	What has changed since 2011?	State and trends	WWF submission
	The past 5 years have seen many extreme weather events, including severe heatwaves, floods and storms. These have caused significant impacts on coastal structures, communities, habitats and species, particularly in Queensland. *Resource extraction and associated coastal infrastructure have increased in recent years, causing severe but localised habitat loss and degradation.* *The condition of some coastal species (e.g. saltwater crocodiles) and communities is stable or improving, but the majority are deteriorating. Of great concern is the continued decline in migratory shorebird populations and saltmarshes.*	*contaminated by fibres from washing of clothes or from cleaning products; …*	
		Coastal habitats and communities: The state of many biological components of the coast is poor and deteriorating. … *Sizeable stretches of Australia's coastline have been altered from their natural state by development, invasive species and recreational use. Approximately 10 percent of the shoreline within the Great Barrier Reef World Heritage Area now comprises human-made structures …(e.g. breakwalls, pontoons, jetties)—an increase of 70 percent in some areas in the past 3 years (Waltham & Sheaves 2015). Native coastal vegetation has been lost to clearing, soil quality has diminished, and island flora and fauna are being severely affected by invasive species. …*	Environmental rehabilitation can play a role in restoring coastal habitats and communities though there is little purpose in doing so while coastal habitats and communities continue to be destroyed. Advocacy for environmental protections is the only way for environmental organisations to address continued destruction.
		Coastal species: … *The destruction of critical nursing, roosting and nesting sites globally and regionally has had broad-reaching ramifications for species that rely on networks of sites to maintain populations. In particular, migratory shorebirds are declining as a result of habitat loss and impacts on critical parts of their migratory route in other nations (Clemens et al. 2016). This is occurring despite protection in Australia, and looks as though it will continue. …*	Environmental rehabilitation will not address the destruction of critical nursing, roosting and nesting sites globally and regionally. Advocacy for environmental protections in other countries is the only way for environmental organisations to address these issues.

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Overview of the state and trends of the marine environment	*A marine heatwave generated by the 2011 La Niña event, superimposed on overall increasing water temperatures, caused widespread impacts on the marine environment off the Western Australian coast, including coral bleaching, fish and invertebrate deaths, and changes to species distribution and community structure.* *Apart from human-caused pressures, the Great Barrier Reef has been significantly affected by 2 events in the past 5 years. Cyclone* Yasi *in 2011 caused widespread direct damage to the reef, and the 2015–16 El Niño event, superimposed on overall increasing water temperatures, generated the highest sea surface temperatures across the Reef on record, resulting in extensive coral bleaching and die-off, particularly across the northern regions.* *Since 2010, 34 new Commonwealth marine protected areas have been declared, resulting in a total of 323 million hectares.* *Since 2011, 2 sea snakes, 2 seabirds, 2 sharks, 1 sawfish and 1 fish have been listed under the EPBC Act, and 2 fish species have been reclassified as critically endangered. Giant kelp forests across south-eastern Australia were the first marine community to be listed as a threatened ecological community, in 2012.* *Australian populations of humpback whales (*Megaptera novaeangliae*) have increased*	*Marine habitats and communities: Generally, habitats and communities in the Temperate East Marine Region and the South-east Marine Regions have been subject to higher historical impacts, such as bottom-trawling impacts on shelf and slope communities, than those in other regions (Pitcher et al. 2015, 2016). Decreasing fishing effort during the past decade has reduced the trawling footprint, which has reduced the impacts on these communities. Fishery closures and marine reserves also offer additional protection for seabed communities.* *The condition of habitats and communities in the Great Barrier Reef to the end of 2015 is considered to range from poor and deteriorating (corals) to good and stable (macroalgae, offshore banks and shoals). Recent surveys of the Great Barrier Reef have reported both increases and decreases in coral cover, with trends highly variable across monitored sites.* *Extensive surveys of the Great Barrier Reef and the reefs of the north-west during the first half of 2016 recorded widespread and extensive bleaching of coral reefs, particularly in the north, as a result of climate extremes and record high water temperatures. …*	Environmental rehabilitation cannot address/resolve pressure on the marine environment, particularly those relating to climate change and over-fishing. Advocacy for environmental protections at the global, national and state levels of government is the only way for environmental organisations to address these issues.
		Marine species: Most marine species groups assessed … are regarded as being in good condition overall, although information is	Environmental rehabilitation cannot address/resolve pressure on the marine environment, particularly those relating to

Topics	What has changed since 2011?	State and trends	WWF submission
	to the point that their current listing as vulnerable could now be reconsidered (Bejder et al. 2016). *Since 2010, 34 new Commonwealth marine protected areas have been declared, resulting in a total of 323 million hectares.*	*lacking to assess the condition or trend of many species and species groups because they are not monitored regularly, if at all.* *Some species have improved from historical declines, including populations of humpback whales. Some species have declined because of cumulative impacts associated with pressures occurring across their marine, and nesting and breeding habitats. …* *Several species with wide distributions that extend beyond Australia's exclusive economic zone … are being affected by high fishing effort or high bycatch rates in areas outside the Australian marine environment.* *Trends are stable or improving for most fish species, … or some species, such as eastern gemfish …blue warehou … and redfish … signs of recovery have not yet been seen. The reasons for this are currently unclear …but changing environmental conditions associated with climate change might be partly responsible.*	whaling, climate change and over-fishing. Advocacy for environmental protections at the global, national and state levels of government is the only way for environmental organisations to address these issues.
		Marine biophysical and ecological processes: Overall, biophysical and ecological indicators of marine health show the marine environment to be in good condition, … *On a national scale, water column turbidity (cloudiness) in open-water environments has decreased, largely because of improved wastewater treatment, reduced nutrient*	Environmental rehabilitation cannot address/resolve pressure on the marine environment, particularly those relating to turbidity, waste water treatment, reduced nutrient inputs, improved agricultural practices, climate change, fishing and marine protected areas. Advocacy for environmental protections at the global, national and state levels of government is

Topics	What has changed since 2011?	State and trends	WWF submission
		inputs, and improved management of agricultural practices and associated run-off. *Reductions in primary … and secondary productivity … have been observed. These reductions are considered to be associated with reduced nutrient supply because of ocean warming.* *Changes to ocean currents associated with climate change have affected connectivity within marine ecosystems, ….* *The National Representative System of Marine Protected Areas is developing steadily, …*	the only way for environmental organisations to address these issues.
Overview of state and trends of Antarctic environment	*Antarctic sea ice has shown a general increase in overall extent, but some areas are showing rapid decline.* *The ozone layer is starting to recover as a direct consequence of international controls on the use of human-made ozone depleting substances.* *Climate change is affecting the entire Antarctic food web, and warmer temperatures on land have already led to the establishment of non-native plants.* *Macquarie Island is recovering following the eradication of invasive vertebrates from the island.*	*The physical and chemical components of the Antarctic environment are changing in response to global pressures of human activity and climate change. These changes are occurring against a backdrop of climatic variability.* *…*	Environmental rehabilitation cannot address/resolve pressure on the Antarctic environment. Advocacy for environmental protections at the global, national and state levels of government is the only way for environmental organisations to address these issues. The program to eradicate invasive vertebrates from Macquarie Island was a direct result of WWF advocacy.