



AUSTRALIA

**SUBMISSION**

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# Submission to the Inquiry into the Importance of Antarctica to Australia's National Interests

The World Wide Fund for Nature-Australia (WWF-Australia) welcomes the opportunity to provide a submission to the Joint Standing Committee on the National Capital and External Territories' inquiry into the importance of Antarctica to Australia's national interests (the Inquiry). We focus our submission on the upholding of the principles of the Antarctic Treaty system; conserving and protecting the unique biodiversity and environment of Antarctica; and developing a better understanding of global environmental and climate science. Our recommendations have been included in the submission as **bolded text**.

WWF-Australia is part of the World Wide Fund for Nature (WWF), a global conservation organisation, employing over 5000 staff in more than 100 countries and with more than 6 million supporters across the world. In the Antarctic, we work on issues related to governance, climate change, wildlife conservation and fisheries management. WWF-Australia participates as an advisor on the Australian national delegation at meetings of the Antarctic Treaty Consultative Meeting (ATCM) and the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR).

The Antarctic and Southern Ocean is one of the most rapidly warming regions of our planet. We are witnessing profound and unprecedented change, notably in sea-ice coverage which has been on a decade long-decline; shrinking to record low levels in 2023<sup>1</sup>. The abrupt transitions observed in Antarctica is signifying a shift in the state of the ecosystem that may be an irreversible tipping point.<sup>2</sup> The growing instability in the Antarctic environment is altering the ecosystem and is likely to have significant implications for biodiversity and for the global earth system as a whole. The importance of preserving Antarctica should be considered a significant national priority by Australia.

In response to these increasing pressures, WWF engages worldwide constructively with governments, research institutes and industry with the aim of safeguarding a wild, thriving Antarctica for future generations.

## Upholding the principles of the Antarctic Treaty System

The Antarctic Treaty System (ATS) encompasses associated international instruments and treaties adopted by the Antarctic Treaty Consultative Parties, including the 1980 Convention on the Conservation of Antarctic Marine Living Resources (CCAMLR), responsible for managing the Southern Ocean, and the 1991 Madrid Protocol on Environmental Protection. The Antarctic Treaty stipulates that Antarctica can only be used for peaceful, scientific purposes. The Madrid Protocol further supplements this and designates Antarctica as a 'natural reserve, devoted to peace and science'.<sup>3</sup>

<sup>1</sup> Siegert, M. J. *et al.* 2023. Antarctic extreme events. *Frontiers in Environmental Science*. 11. doi.org/10.3389/fenvs.2023.1229283

<sup>2</sup> Hobbs, W. *et al.* 2024. Observational Evidence for a Regime Shift in Summer Antarctic Sea Ice. *J. Clim.* 37, 2263–2275.

<sup>3</sup> <https://www.ats.aq>

Australia has a rich history in Antarctica as one of the original signatories to the Antarctic Treaty in 1959. Australia has played an active, influential and constructive role in Antarctic conservation within the framework of the Antarctic Treaty System (ATS) for many decades, presenting compelling scientific research and proposing new and effective measures to enhance the protection of the Antarctic environment.

Historically, the ATS has been incredibly successful in its decision-making; implementing measures that have ensured peaceful cooperation and the primacy of science, indefinitely banning commercial mining through the Protocol, and actively protecting and conserving Antarctic flora and fauna. However, the ATS is now failing to keep up with the rate of environmental change in Antarctica, as well as best practice internationally in environmental management and conservation.

*Growing challenges: Geopolitical tensions threaten the ATS*

For over 7 years, progress to uphold the principles of conservation under the ATS has been stymied. Current geopolitical tensions are affecting Antarctic governance, and as a consequence Antarctic conservation - most notably through the failure to reach consensus on a number of proposals submitted to the Antarctic Treaty Consultative Meeting (ATCM), such as proposals for new Antarctic Specially Protected Areas (ASPAs) or to designate the emperor penguin as a Specially Protected Species, and the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR), such as the proposals to designate Marine Protected Areas (MPAs) in the Antarctic Peninsula, Weddell Sea and East Antarctica. The reasons for blocking consensus are clearly driven by geopolitical considerations.

Persistent opposition to conservation initiatives both in CCAMLR and the ATCM has no precedent in the recent history of these organizations. In contrast to persistent blocking of conservation initiatives at CCAMLR, the adoption of fishing conservation measures has continued mostly as usual. Underlying these discussions are diverging perspectives about the relationship between conservation and “rational use” of marine life in the CAMLR Convention Area, increasingly in contradiction with the original intent of the Convention where rational use is just one part of conservation.<sup>4</sup>

At this critical moment, Australia has a responsibility to maintain the continent as a place of peace and cooperation despite these geopolitical tensions. Australia must remain steadfast in its commitment to Antarctic Treaty System conservation values whilst seeking areas of common ground and reasonable compromise with the countries blocking consensus at ATCM and CCAMLR. Australia's priorities at both the ATCM and CCAMLR should focus on conservation initiatives as outlined in the section ‘Conserving and protecting the unique biodiversity and environment of Antarctica’.

*WWF recommendations: strengthening Australian engagement in the ATS*

As an original signatory of the Antarctic Treaty, Environment Protocol, and CAMLR Convention, **Australia must continue to work with other like-minded countries to reinforce ATS values.** This should include making proposals for science-based conservation measures at both the ATCM and CCAMLR and seeking opportunities both during meetings and intersessionally to discuss positive ways forward in light of geopolitical tensions.

**Australia should take more proactive steps to reinforce the provisions and principles of the Protocol and the CAMLR Convention.** In general, the ATCM and CCAMLR have been unable to reach consensus on many conservation-focused proposals in recent years due to opposition from one or two Parties. These Parties often erroneously claim that the science behind the proposal is insufficient, or there is not enough of an imminent threat. Therefore, Australia should continue to

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<sup>4</sup> Antarctic and Southern Ocean Coalition (ASOC). 2023. CCAMLR Meeting Paper: [SC-CAMLR-42/BG/24](#)

respond consistently to refute these claims and to emphasize the precautionary approach, and to defend the high quality of the science that is conducted by Australia and others.

As a priority, **the Australian delegations to the ATCM and CCAMLR must engage earlier, more regularly, proactively and always constructively with counterparts from some of the nations that are currently opposing key conservation measures to develop stronger diplomatic bonds** – in particular with key delegations to the ATCM and CCAMLR. Deeper engagement should be across policy, science and conservation. It may also be beneficial to consult and/or to bring onto the delegation, expertise and understanding in foreign affairs of nations currently not agreeing to consensus. Increasing the frequency of both formal and informal intersessional discussions about how to work towards a common understanding is, in our view, crucial to making a breakthrough in the current impasses. Although challenging, the ATS has achieved its many important conservation victories because countries have committed to negotiating in good faith, even when there was significant disagreement.

#### *National policy alignment with ATS principles*

Furthermore, Australia should ensure that its internal policies are consistent between international organisations. The ATS includes all of the world's largest carbon-emitting countries, and thus for those countries to truly fulfil their Treaty obligations, they **should work towards rapid reductions in global emissions to ease the pressure on Antarctica**. Australia could also encourage and enable the Scientific Committee on Antarctic Research ([SCAR](#)) to have a stronger voice at UNFCCC COP, ensuring that Antarctic science, and the jeopardy of Antarctic change, is understood and firmly embedded in UNFCCC COP negotiations. Similarly, the ATS already has legal frameworks in place for area protection, and speeding up the designation of areas is critical to fulfilling the Convention on Biological Diversity (CBD) Kunming-Montreal Global Biodiversity Framework target to protect 30% of the planet for nature by 2030 ('30x30').

## **Conserving and protecting the unique biodiversity and environment of Antarctica**

#### *CCAMLR Marine Protected Areas contributing to 30x30 global goals*

CCAMLR has been working since 2009 towards establishing a network of Southern Ocean MPAs, devoting significant time and resources. This commitment led to consensus adoption of two MPAs, the South Orkney Islands Southern Shelf MPA in 2009 and the Ross Sea region MPA in 2016, after iterating over time and negotiating trade-offs. Now, three more critically important MPA proposals remain under negotiation – the East Antarctic, Weddell Sea and Antarctic Peninsula. CCAMLR is now a decade behind on honouring their commitment to designate a representative system of MPAs, and Member States have commented that some Parties are imposing a higher burden of proof on the current MPA proposals than they are on proposals for fishing, which is contrary to the conservation objective of the Convention.<sup>4</sup>

Australia is a main proponent (with France) on the East Antarctic MPA proposal, a co-proponent on the Weddell Sea MPA proposals, and contributes to the Antarctic Peninsula MPA proposal negotiations. The East Antarctic MPA proposal, which has been under negotiation for over a decade, has evolved significantly over time (see Figure 1) with some core areas of the original proposal removed (from seven MPAs to three), activities accommodated, and new zones clarified during this time.

While the East Antarctic MPA proposal is consistently noted as a priority for Australia at annual CCAMLR meetings, the focus is more often around Australia's interests in Antarctic fisheries. In recent years, limited resources and capacity at the Australian Antarctic Division (AAD) may have

contributed to stalled progress on the East Antarctic MPA proposal both technically and politically, and there may be further limitations on engagement with other CCAMLR MPA proposals.

**Australia should allocate additional funding and resources to the AAD to support CCAMLR MPA design and implementation, and the overall prioritisation of conservation within the ATS.**

The Antarctic Peninsula is the most rapidly warming region in Antarctica and is under additional pressure from an expanding industrial krill fishery that operates primarily in this region. **Australia should identify key opportunities to support international efforts to urgently designate the Antarctic Peninsula MPA**, such as strengthening capacity for engagement at the CCAMLR Symposium on Antarctic Peninsula conservation (July 16-20, 2024 in Seoul, Korea) and encouraging participation of high-level government officials at annual CCAMLR meetings.

#### *Opportunity for Australia to act as an ocean leader in sub-Antarctic conservation*

The current review of the Heard Island and McDonald Islands Marine Reserve, within Australia's sub-Antarctic external territory, presents a once-in-a-decade opportunity to expand and upgrade protection arrangements to safeguard wildlife in this region as they adapt to a rapidly warming climate. Preliminary findings from a review of the existing HIMI Marine Reserve suggest that current protection levels are inadequate.<sup>5</sup>

**Australia has an upcoming opportunity to act as a global leader of ocean conservation in the Southern Ocean and significantly expand the Heard and McDonald Islands marine reserve boundaries to cover priority areas for conservation and ensure protection is comprehensive, representative and adequate, in line with Australian government's 30x30 protection targets.**

#### *Conservation tools ready for implementation*

In addition to MPAs, there are a number of conservation issues at both the ATCM and CCAMLR that need to be addressed urgently. The Antarctic environment is subject to increasing pressures from human activities at the same time as climate change is causing massive and accelerating disruptions to ecosystems. At the ATCM, these include regulating tourism, responding to climate change, preventing the introduction of non-native species, and expanding and effectively managing the Antarctic Specially Protected Areas (ASPA) system. At CCAMLR, these include responding to climate change, ensuring fisheries management is highly precautionary, and enhancing compliance on fishing vessels.

The Protocol on Environmental Protection to the Antarctic Treaty and the CAMLR Convention contain all the tools and provisions needed to address these issues, despite being decades old. However, both the ATCM and CCAMLR require consensus in decision making, and in recent years, consensus on many issues has been difficult to achieve.

#### *Growing tourism*

The human footprint in Antarctica is growing. Between 1992 and 2020 the number of tourists visiting Antarctica increased ten-fold and continues to grow, rising to 75,000 in the 2019-20 season and again to 104,897 in the 2022-23 season, meaning the negative environmental impacts of tourism are likely increasing.<sup>6</sup> Existing ATS regulations do not adequately protect the environment from tourism impacts, and an effective management framework to control growth and regions closed to visitation must be urgently introduced.

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<sup>5</sup> Constable, A.J. et al. 2024. Understanding the marine ecosystems surrounding Heard Island and McDonald Islands (HIMI) and their conservation status. UQA School of Agriculture and Environment.

<sup>6</sup> International Union for Conservation of Nature. 2023. Issues Brief. [Impacts of Tourism in Antarctica](#).

**Australia should engage with other Antarctic Treaty Consultative Partys (ATCPs) to develop proposals to manage the growth in the number of tourists and their footprint**, which could involve a number of regulations, such as developing more site guidelines for visitors (SGVs), instituting a cap on total numbers for the Antarctic Peninsula region, restricting site usage or limiting the number of vessels. Additionally, there are area protection tools ready for implementation that would restrict tourism activities in the most vulnerable regions.

#### *Antarctic Specially Protected Areas (ASPAs)*

Annex V of the Madrid Protocol makes provision for special protection of areas. Currently, 75 Antarctic Specially Protected Areas (ASPAs) have been designated.<sup>7</sup> In recent years, designation of ASPAs has become more difficult and proposals have been limited.

In an Australian led study, it was found that “Antarctica is one of the planet’s least protected regions, with only 1.5% of its ice-free area formally designated as specially protected areas. Five of the distinct ice-free ecoregions have no specially designated areas for the protection of biodiversity. By any measure, including Aichi Target 11 under the Convention on Biological Diversity, Antarctic biodiversity is poorly protected by reserves, and those reserves are threatened”.<sup>8</sup>

Australia should work with other ATCPs to develop a systematic network designed to conserve Antarctic biodiversity and limit human activities in the most vulnerable regions. The data to inform this design is readily available through National Antarctic Programs, international science groups such as SCAR, international monitoring programs under the ATS and could include Important Marine Mammal Areas (IMMAs) and Important Bird Areas (IBAs).

#### *WWF recommendation*

**Australia should continue to be a strong voice for conservation within the ATS and invest additional diplomatic effort and skills in coordinating with other countries to promote measures designed to preserve the Antarctic environment for the long term.** Australia should also work, to the extent possible, with all countries that are currently blocking consensus to find ways forward on specific proposals as well as to reinforce the conservation values of the ATS.

## **Developing a better understanding of global environmental and climate science**

International scientific cooperation underpins successful decision-making at the ATCM and CCAMLR and is critical to investigating scientific questions and implementing conservation strategies that transgress geographical boundaries. The Australian Antarctic Division is Australia’s National Antarctic Program responsible for carrying out research and monitoring national priorities in Antarctic and the Southern Ocean, with significant contributions to international research also made by Australian academic institutions, such as the Institute for Marine and Antarctic Studies (IMAS).

In 2023, the Australian Antarctic Division reported an overspending of \$42 million and issues with budget transparency, which resulted in cost cutting and budget restraints that have impacted the delivery of science in the Antarctic. Scientific programs that have been impacted include long-term sea-ice and climate monitoring, both critical for our understanding of climate change impacts at a local and global scale, ongoing monitoring of rapidly declining penguin populations, and activities to remediate damage caused by human activities.

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<sup>7</sup> <https://www.ats.aq/devph/en/apa-database/search#apa-results>

<sup>8</sup> Shaw, J.D. 2014. Antarctica’s Protected Areas Are Inadequate, Unrepresentative, and at Risk. PLoS Biol. 12, e1001888.

In August 2023, the Senate referred an [inquiry into Australian Antarctic Division funding](#) for inquiry and report, which has been extended twice to May 2024.

It is critical that the inquiry into AAD funding is conducted in a timely and efficient manner, and that Antarctic science funding is restored so that critical monitoring activities can resume.

Additionally, it is critically important for the conservation of Antarctica that adequate resources are allocated for conservation science and policy initiatives outlined in this document, which will directly impact Australia's ability to engage as a global leader in Antarctic conservation.

If you require further information about this submission, please contact Emily Grilly, Antarctic Conservation Manager, WWF-Australia on

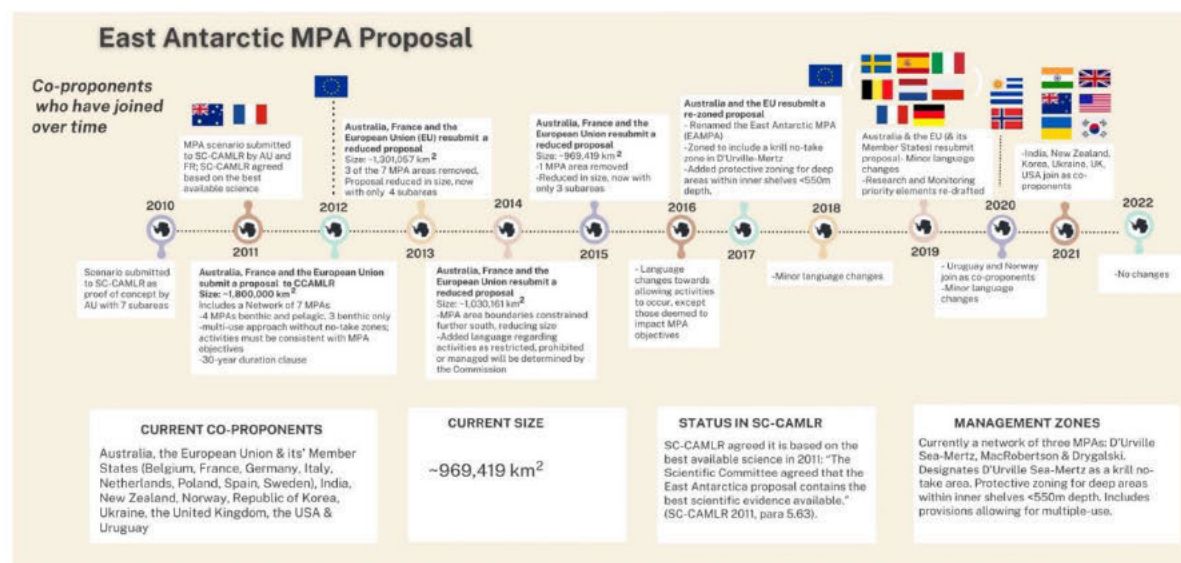


Figure 1. Timeline of changes to East Antarctic MPA Proposal. Bottom boxes show current co-proponents, size, status in SC-CAMLR and Management Zones.<sup>9</sup>

## For more information

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<sup>9</sup> Antarctic and Southern Ocean Coalition. 2023. CCAMLR Meeting Paper. [CCAMLR-SM-III/BG/03](#)