



Reference: 0-27-25

Tuesday, 14 October 2025

Australian Government
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
CANBERRA ACT 2601

Re: Implementing Australia's Strategy for Nature 2024-2030

Dear Sir / Madam,

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide a survey submission on the Australian Government's implementation plan to support [Australia's Strategy for Nature 2024-2030](#). This submission responds to the questions raised in the [discussion paper](#), developed to inform stakeholder consultation, and also includes contextual information about the SCCG's role and activities in marine biodiversity conservation. Further information on the SCCG can be found on its web-site at www.sydneycoastalcouncils.com.au.

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? If not, what additional outcomes will support us to achieve this target or enabler of change?

The SCCG supports the intent and direction of the outcomes outlined in the discussion paper for the following targets:

- Target: Protect and conserve 30% of Australia's landmass and 30% of Australia's marine areas by 2030
- Target: Minimise the impact of climate change on biodiversity

These two outcomes, which are of particular interest to the SCCG, represent the main areas where national action should be focused. However, the outcomes will not be fully realised without stronger emphasis on implementation, governance reform and local delivery mechanisms, particularly in coastal and marine areas where population pressures and climate impacts intersect.

The SCCG considers that the outcomes must be underpinned by a whole of government approach, ensuring clear alignment between Commonwealth, state and local government frameworks. Without coordinated action and adequate resourcing, there is a significant risk that conservation actions will remain fragmented and outcomes inconsistent across jurisdictions.

Australia's marine and coastal management systems exemplify this gap. While the Commonwealth manages extensive offshore marine parks, state-managed nearshore systems are unevenly represented. In NSW, six bioregions span the coast, yet only four have marine parks in place. Of these, most are multi-use zoned, typically comprising 15-20% designated as sanctuary zones and around 75% habitat protection zones. Overall, 7.4% of the NSW marine environment is highly protected as no-take areas; however, two bioregions still lack adequate protections for real biodiversity benefits. The Hawkesbury Shelf Bioregion and the Twofold Shelf remain critically under-

protected, lacking adequate sanctuary coverage and consequently failing to meet national or international conservation standards.¹

The NSW Government therefore has an opportunity to strengthen the protection of marine biodiversity by revitalising its Marine Protected Area (MPA) system to ensure maximum biodiversity benefits. The SCCG has consistently raised concerns that the NSW Government has missed these critical opportunities to strengthen marine biodiversity protection through more effective frameworks and implementation and the reform of outdated aquatic reserve arrangements, which were recently renewed for another five years without consultation or review. These decisions represent missed opportunities to enhance biodiversity protection in alignment with the 30x30 target.

The NSW Marine Estate Management Authority (MEMA) has itself acknowledged that aquatic reserves in the Sydney region are inadequate and under-represented, failing to meet the internationally recognised CAR principles (Comprehensive, Adequate, Representative), following the release of the [NSW Government's Discussion Paper – Hawkesbury Shelf Marine Bioregion Suggested Management Initiatives](#). Despite this, the NSW Government chose not to progress the proposed Sydney Marine Park in the Hawkesbury-Shelf Marine Bioregion further undermining progress toward these national goals. Scientific advice from MEMA's own Expert Knowledge Panel supports the need for more sanctuary zones, which have been shown to deliver the strongest positive effects on biodiversity, yet their limited coverage across the NSW marine estate severely constrains their effectiveness.²

The SCCG also notes recent policy directions that conflict with conservation objectives. Notably, the NSW Government's recent move to [establish an additional independent peak body for recreational fishers](#) that risks duplicating existing entities and diverting over \$1 million in public funds away from critical biodiversity and marine conservation initiatives, funds that could go towards achieving these targets. Prioritising access over protection contradicts the intent of the [Marine Estate Management Act 2014](#), which seeks to create a comprehensive, effectively managed network of marine parks and aquatic reserves, consistent with Ecologically Sustainable Development (ESD) principles enshrined in NSW environmental law.

To achieve the 30x30 targets and climate resilience targets, the SCCG recommends adding an additional outcome focused on:

“Strengthened intergovernmental governance, capacity and accountability mechanisms to ensure consistent, science-based management of coastal and marine biodiversity, integrating climate adaptation, restoration and conservation planning across all levels of government.”

This should include reform of state-level governance arrangements, improved alignment between the NSW [Marine Estate Management Act 2014](#), [Fisheries Management Act 1994](#), and [Biodiversity Conservation Act 2016](#), and greater support for local governments to deliver on-ground action.

Inconsistencies and gaps in NSW's existing governance and policy arrangements demonstrate a lack of alignment between intent and implementation and not only undermine the integrity of the state's environmental governance framework but also risk derailing NSW's contribution to achieving Australia's national targets.

While these national targets and outcomes provide a strong national direction, their success will depend on strengthening state and local delivery frameworks and revitalising states', such as NSW, marine protection systems to ensure Australia's coasts and oceans are resilient, representative, and effectively managed for future generations.

¹ Booth & Beretta, 2023. Creating a world class Marine Protected Area system. Australian Marine Conservation Society

² [Marine-Protected-Areas-technical-report-biological-and-ecological-review-MEEKP-2020.pdf](#)

2. Are there any barriers to achieving this target or enabler of change? If yes, what solutions do you suggest for overcoming these barriers?

Achieving the 30x30 conservation target and climate change impact targets is hindered by fragmented governance, complex legislative and weak translation of high-level goals into practical, on-ground action. Misaligned frameworks and limited accountability mean that strong national and state aspirations are often undermined by competing land-use priorities. [The 2023 Henry Review](#) of the NSW [Biodiversity Conservation Act 2016](#) found biodiversity objectives are frequently secondary to development interests and fail to reflect modern “nature positive” goals.

In NSW, these governance and implementation gaps are evident in the Coastal Management (CM) Framework, which was intended to provide a strategic and integrated approach to managing the coast. In practice, however, the [NSW Audit Office’s review of the CM Framework](#) has found that there has been a lack of clear strategic direction and insufficient funding to support the development and implementation of coastal management programs (CMPs) across the state. Many councils lack the resources and support needed to progress CMPs, resulting in fragmented coastal planning and reduced capacity to address hazards, biodiversity loss, and development impacts.

The absence of a cohesive and well-resourced framework limits councils’ ability to deliver local outcomes and hinders NSW’s contribution to national goals like protecting 30% of land and sea by 2030. The SCCG has consistently advocated for a coordinated catchment management approach across the Sydney region, recognising its critical role in protecting water quality, native vegetation, and urban ecosystems. Since the abolition of Catchment Management Authorities (CMAs) in NSW, there has been a notable governance gap, with no formal regional entities tasked with overseeing integrated catchment-scale planning and delivery. This fragmentation has made it challenging to meet environmental targets particularly in relation to biodiversity, stormwater management, riparian restoration, and waterway health.

Recent reviews and strategies, including the [NSW Water Quality Governance Roadmap](#), acknowledge the complexity of shared responsibilities across more than 30 agencies and over 50 legislative instruments. Despite these efforts, enduring and place-based governance structures remain absent in metropolitan areas like Sydney, where pressures from urbanisation, climate change, and cumulative impacts demand a more holistic and accountable framework.

To meet biodiversity targets, Councils will need strong governance coordination and stable long-term funding arrangements. Aligning legislative frameworks, governance structures and local implementation mechanisms whilst addressing the resourcing and strategic gaps within frameworks, such as coastal management, will be essential to overcoming barriers and ensuring states such as NSW can contribute meaningfully to achieving Australia’s 30x30 targets.

3. Are you or your organisation already taking action to contribute to achieving this target or enabler of change? If yes, please provide further information on the action you are taking.

The SCCG is actively contributing to the achievement of Australia’s Strategy for Nature 2024-2030 targets through collaboration, capacity building, advocacy and research that seeks to strengthen the protection and sustainable management of coastal and estuarine environments across the Sydney region.

The SCCG is a regional organisation of councils, established in 1989 to promote collaboration among member councils on environmental issues relating to the sustainable management of the urban coastal and estuarine environment. The group comprises nine councils adjacent to Sydney marine and estuarine environments and associated waterways and represents nearly 1.3 million Sydneysiders.

We are guided by the [SCCG’s 2019-2029 Strategic Plan](#) which includes six goals, with those relevant to the Strategy listed below:

1. People and places adapt to a changing climate and future shocks and stressors
2. Waterways and the foreshore are protected and healthier
3. Marine biodiversity is protected in the bioregion
4. There is a collaborative, effective and consistent approach to coastal and estuarine management

Our work directly supports the national 30x30 target and climate resilience target by advancing local implementation of conservation initiatives, supporting measures to improve governance alignment and facilitating evidence-based decision-making for coastal and estuarine environments.

The SCCG delivers a range of cross-agency projects and campaigns that build local government capacity to plan and implement measures for the sustainable management of coastal and estuarine environments. Our member Councils are directly engaged in biodiversity protection and habitat restoration projects. This includes the [protection of Little Penguins within Sydney Harbour](#), which focus on protecting nesting habitats, managing predator impacts, and improving community education to safeguard this endangered population. Another example is the collaboration with research institutes such as the Sydney Institute of Marine Science (SIMS) to conserve the endangered White's seahorse through habitat restoration, and the application of ecologically engineered structures such as Living Seawalls, designed to enhance biodiversity along Sydney's increasingly urbanised foreshore environments.

A key regional project is the development of the [Outer Sydney Harbour Coastal Management Program \(CMP\)](#), delivered under the NSW Coastal Management Framework. The CMP seeks to establish a long-term strategy for the coordinated management of the coastal zone, integrating the efforts of participating councils and state agencies to protect biodiversity, improve waterway health and enhance climate resilience.

Through these collaborative projects, SCCG's advocacy and ongoing partnerships, the SCCG continues to strengthen local government capacity, facilitate knowledge sharing and promote coordinated regional action. These initiatives contribute directly to the national goals of protection, conserving and restoring Australia's coastal and marine biodiversity, helping to achieve the 30x30 targets and the broader outcomes of the Strategy for Nature 2024-2030.

Would you like to provide feedback on Australia's approach to monitoring, evaluation and reporting under the Global Biodiversity Framework (GBF)? 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.)?

The SCCG supports the Australian Government's recognition that monitoring, evaluation and reporting (MER) are central pillars of Australia's contribution to the Global Biodiversity Framework (GBF). The approach outlined, particularly the commitment to align Australia's Strategy for Nature reporting with the GBF Monitoring Framework, represents a significant step towards greater national consistency and transparency. The SCCG also acknowledges the national efforts underway to align monitoring across jurisdictions, build data capability, and strengthen reporting through integration with State of the Environment reporting.

While the overarching direction is sound and noting the difficulty in commenting due to the high-level nature of the content, several areas require particular attention to ensure the MER framework is practical, inclusive, and delivers meaningful outcomes across all levels of government. From a local government perspective, key priorities include:

- **Involving local government in framework development:** Councils are critical implementation partners in biodiversity management but are often excluded from national reporting processes. Enabling their participation will strengthen data accuracy and improve understanding of local-scale progress towards national targets.
- **Improving data coordination and integration:** There is a need to align existing monitoring programs across Commonwealth, state and local levels to reduce fragmentation and ensure consistency in data collection, management and reporting.
- **Addressing data gaps and resourcing constraints:** While substantial data already exists across multiple platforms, particularly state-based datasets, accessibility and consolidation remain limited for practical use within local government contexts.

Overall, the SCCG encourages the Australian Government to adopt a coordinated, whole-of-government approach to monitoring and reporting, with clear pathways for local government input. This will help ensure that Australia's MER Framework not only meets international reporting

obligations under the GBF but also reflects the on-ground realities of biodiversity management across local and regional scales.

I trust our submission will be useful for the development of the implementation plan. If you have any queries, please contact me by email at sarah@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Penny Joyce
Executive Director