

Submission to the 2022 UNFCCC Ocean and Climate Change Dialogue

Submitted by Whale and Dolphin Conservation (WDC) on behalf of WDC and the Marine Conservation Society

Introduction

Following decision *1/CP.26 Glasgow Climate Pact (paragraph 61)* to hold an annual dialogue to strengthen ocean-based action, Marine Conservation Society and Whale & Dolphin Conservation welcome the request by the SBSTA Chair to observer organisations and Non-Party stakeholders to submit their views on possible topics for the Ocean and Climate Change Dialogue to take place in conjunction with SBSTA 56 in 2022 and we would like to hereby share our suggestions and recommendations.

General recommendations

We welcome the upcoming first annual dialogue and recommend that the meeting address the most relevant and pressing issues of the ocean-climate nexus as follows:

- Mainstreaming and integrating ocean-climate action within the UNFCCC and other UN bodies,
- Addressing knowledge, capacity and process gaps and identifying means of implementation.
- Blue Carbon (both coastal and offshore) to be adequately accounted for and mainstreamed within climate (and nature) strategies
- Marine Protected Areas, alongside species specific management plans, to be strategically designated and connected in an absolute minimum 30% of the global ocean by 2030.
- International Climate Finance provisions to consider ocean-based solutions at least to the same extent as nature-based solutions on land through adequate ocean finance mechanisms.

Suggested topics for 2022 dialogue (dialogue themes and cross-cutting issues):

Climate, Ocean and Fossil Fuels

Ocean-based natural and technical solutions must be part of the many urgent and varied solutions required to address the climate crisis. Both emissions elimination/reduction and marine ecosystem recovery are essential in the fight against climate change. The protection of the ocean should not be used as an offset for emissions that can and must be eliminated/reduced. Countries must be urged to commit to a ban of new fossil fuel exploration activities, especially considering it can take decades for new fossil fuel developments to become operational. Countries must similarly commit to a phase-out of current exploitation activities. Ending offshore fossil-fuel development would also effectively stop one of the biggest emitters of anthropogenic noise pollution, which has a proven detrimental effect on ocean life like marine mammals, crustaceans, molluscs and coral reefs.

Finance

The ocean is a vital resource on which the global economy depends. More than this, the health of marine ecosystems is intrinsically linked to our ability to both survive and thrive as a species and as a global community

Nature-based solutions, both terrestrial and marine, could provide at least one third of the climate change mitigations required, but currently they attract less than 3% of the funds invested globally in addressing climate change. Countries must be urged to assume a significantly bigger role in the financing of effective measures to protect and restore the ocean and its vital functions. The benefits of acting decisively and urgently are significant and diverse: effective climate mitigation to prevent climate breakdown, climate adaptation to increase humanity's resilience to the changes that are already locked in, the provision of sustainable livelihoods for marine and coastal communities, a cheap and nutritious source of protein for billions around the world, a pristine biome to catalyse scientific and medical breakthroughs, and a rich, awe-inspiring habitat to continue the chain of millennia's worth of cultural heritage and the anchor of our spirituality and identity¹.

We support UNEP's 'State of Finance for Nature'² call to invest smarter, whilst reimagining, recreating, and restoring the marine environment. Governments need to be encouraged to introduce nature-based oceanic solutions as a formal cross-cutting modality of investment with formalised strategic plans and resources associated with it. Furthermore, Governments should be encouraged to align private finance with public policy; Scaling up capital flows to nature requires unlocking private finance at a far greater scale through blended finance, changes in fiscal and trade policies, and other incentives.

If these benefits are to be realised, policymakers must re-balance the books of climate finance and apportion ocean-based sustainable investment in line with its value, and include currently overlooked open ocean ecosystems within the definition of blue carbon

Blue Carbon - knowledge gaps and accounting approaches

Globally, the rewilding of key blue carbon securing marine and coastal ecosystems could deliver carbon dioxide mitigation amounting to at least 1.83 billion tonnes - 5% of the emissions savings we need to make globally.³ This figure doesn't include the enormous quantities of carbon stored in fish and other marine wildlife, in marine ecosystems such as coral reefs, seaweeds and shellfish beds, the vast stores of carbon in seabed sediments or that is cycled and stimulated by ecological functions of species like whales⁴. It is vital that we better protect ocean ecosystems for both biodiversity and blue carbon.

¹ . A drop in the ocean: Closing the gap in ocean climate finance, Deloitte, Published November 2021 <https://www2.deloitte.com/content/dam/Deloitte/uk/Documents/risk/ocean-financing.pdf>

² State of Finance for Nature, UNEP, Published 27 May 2021 <https://www.unep.org/resources/state-finance-nature>

³ Blue Carbon, Ocean-Based Solutions to fight the Climate Crisis report by Marine Conservation Society and Rewilding Britain, Published May 2021, P.2 , https://media.mcsuk.org/documents/BlueCarbon_Report.pdf

⁴ Whales – Their future is our future, Whale and Dolphin Conservation, Published 2021 <https://uk.whales.org/wp-content/uploads/sites/6/2021/01/Green-Whale-Scientific-report-2021.pdf>

Seabeds are significant carbon stores (or 'carbon sinks') that are vulnerable to disturbance from activities such as bottom trawling and dredging. These activities result in the carbon being resuspended in the water, exacerbating ocean acidification and potentially escaping into the atmosphere as carbon dioxide. For example, the UK's shelf seas cover some 500,000 km² and are estimated to store 205 million tonnes of carbon, some 50 million tonnes more than held within the UK's entire stock of standing forests.

We believe there should be a focus on nature-based climate solutions over ahead of as yet unproven geoengineering and technological solutions in an ocean context. The implementation of habitat and ecosystem function restoration processes over anthropogenic solutions not only makes economic sense, but brings with it a positive feedback loop of additional carbon fixation, storage and sequestration, but also increased biodiversity, which further increases resilience of marine ecosystems.

Where fisheries are pursued, we urge governments to commit to fully sustainable conservation-led management of commercial fish and shellfish stocks, applying an ecosystem-based approach to eliminate carbon emissions with the halving of fisheries related carbon emissions by 2030, to deliver climate and nature positive fishing. All fisheries should only proceed with appropriate bycatch mitigation measures to avoid incidental mortality and injury to marine mammals and other non-target species.

Beyond the seabed and coastal blue carbon ecosystems, there is encouraging new research and science, but also significant knowledge gaps on the capacity of other marine ecosystems such as kelp forests and algae, as well as the important ecological functions of key marine species as 'ecosystem engineers', including marine megafauna such as whales, but also fish, to mitigate climate change and biodiversity loss. More in-depth understanding of the sequestration potential of these blue carbon ecosystems through scientific research is needed to ensure adequate policy guidance building on sound scientific data is developed. The lack of methodological guidance on carbon accounting for these other blue carbon ecosystems could be addressed by a corresponding extension of the IPCC's Wetlands Supplement.

The lack of scientific understanding of some blue carbon habitats and ecological functions of species - for instance in the high seas and deep sea - should not be a barrier to introducing investment for those habitats or species where the evidence-base is strong (e.g., mangrove, saltmarsh, seagrass) or emerging. Mandates are required for government and industry to scale up significant funding into R&D, to enhance knowledge and test, develop and implement nature-based ocean-climate solutions that extend to the high seas and deep sea. Governments should also be encouraged to enter into partnership with private investors (who have a proven interest independent from their business model) to demonstrate commitment to blue economy mechanisms at the early phase of implementation.

Climate Smart Fisheries

The fishing industry's carbon footprint combined with its significant impacts on long-term carbon capture and storage in blue carbon habitats makes the industry an important consideration when designating GHG reduction and climate mitigation strategies. However,

governments have generally been slow to acknowledge the fishing industry's impact on GHG emissions and blue carbon stores. Fisheries are commonly missed from assessments of GHGs, not considered in climate change mitigation strategies and are largely ignored during climate negotiations.

A comprehensive review of the existing knowledge around fisheries, climate change and blue carbon with a UK-focus, clearly identifies the specific impacts of UK fisheries on blue carbon within UK waters. Practical recommendations highlight the essential elements that are needed to form a climate-smart strategies for fisheries management to help tackle the current climate crisis. Climate-smart fisheries management will help futureproof fisheries and allow them to play their role in combatting climate change and help in the achievement of net zero. Such management means that fisheries must clearly acknowledge and mitigate their contribution to GHG emissions, whilst building resilience to climate change threats.

At present, climate-smart fisheries approaches are evolving largely across developing countries and small island nations. This is likely because of the heightened awareness around early onset climate change threats in developing and island nations, bringing greater need for climate smart action. Developed economies, however, appear to be slower to adopt climate-smart approaches to fisheries management, regardless of having more funds and capacity available for new technology development to support climate-smart fishery plans.⁵

Marine Protected Areas

We believe there is an urgent need for the strict zoning of ocean areas for biodiversity protection - much larger than terrestrial extents, protecting the entire water column and benthos. It is vital that such Marine Protected Areas are governed by effective management plans which don't allow for exploitative actions and ensure the strict protection of the MPA and the ocean life within them. In that context, countries should be mandated to assume a significantly greater role in the funding and supporting of MPAs, site management and conservation initiatives that restore and protect ocean health.

We further believe that adaptive co-management and conflict resolution mechanisms must be created for nature-based solution projects across development contexts to enhance future governance success.

In addition to MPAs, and as noted by UNCLOS 65 and 120, there is a need for recognition that some species, especially migratory species like whales and dolphins, as well as many species of fish, require international cooperation for their conservation, especially as we now know they play an essential role in providing globally important ecosystem functions that exceed direct use and economic qualification and should exclude any exploitative value in order to safeguard those species and their role for future generations. Governments should be encouraged to participate in scalable, cost-effective, opportunities to increase protected

⁵ Shifting Gears, Achieving Climate Smart Fisheries report, Marine Conservation Society, WWF & RSPB published August 2021
https://media.mcsuk.org/documents/Climate_Smart_Fishing_Report_FINAL.pdf

areas, such as the Important Marine Mammal Areas (IMMAs) initiative⁶, which seeks to identify areas that may merit place-based protection and/or monitoring. Such initiatives recognise how such flagship species represent powerful political and public levers for the conservation of less popular or less well-known organisms, communities, or habitats over large areas of ocean.

International agreements established before the development of the SDGs require enhancement of conservation objectives as a priority over previously damaging focus on exploitation. In recognition of the vital role our ocean must play in urgent climate change mitigation and adaptation, these ocean-based solutions must be adopted with pace, and at scale, by 2030.

There is an urgent need for countries to act decisively to address and put an end to damaging practices such as bottom trawling, the use of gillnets and other large scale commercial fishing practices within marine protected areas. In particular, developed countries such as the United Kingdom should demonstrate good practice and end the use of bottom towed fishing gear in offshore Marine Protected Areas.⁷

Structure of the 2022 Dialogue Participation and Inclusion

The UNFCCC must ensure a balanced representation of expertise and knowledge - ensuring gender-balance - during this dialogue, incorporating participatory processes and ensure full access of civil society representatives.

A welcome focus on area-based marine conservation and other area specific tools must consider the impacts on coastal communities and work in a participatory way in full recognition that those communities on the front-line of climate change in the least developed nations are often the least responsible for current and historical carbon emissions. In that context, the countries responsible for the majority of those historical carbon emissions need to commit to the \$100bn climate finance package promised via UNFCCC, but also the creation of significant amount of additional funding sources (via state, business and philanthropy) needed to ensure the adequate financing of mitigation and adaptation measures and biodiversity protection that include measures protecting the most vulnerable countries and communities.

⁶ <https://www.marinemammalhabitat.org/immas/>

⁷ Marine unProtected Areas report, Marine Conservation Society, published January 2021
<https://media.mcsuk.org/documents/marine-unprotected-areas-summary-report.pdf>