



Comments on the Revised Zero Draft of the Call for Action April 17, 2017

Background

The Wildlife Conservation Society (WCS) is an international, science-based wildlife conservation organization with terrestrial and marine programs in more than 60 countries. Our marine conservation program operates in 23 countries, with particular focus on: small-scale, coastal fisheries; marine and coastal habitat protection, including through marine protected areas; and the conservation of marine species, including in particular marine mammals, sharks, and rays. We have submitted a document outlining our recommendations for the Call for Action, which can be found on the Ocean Conference website, and is attached for your reference.

General Comments

Overall, WCS welcomes the general approach and terms of the Call for Action. In particular, we endorse calls for sustainable and equitable small scale fisheries, and for urgent efforts to protect coral reef ecosystems at risk due to climate change impacts.

WCS has four general comments:

1. First, we urge that the Call for Action generally recognize the importance of marine biodiversity – in other words, marine species – for sustainable development. Although implicit in the Zero Draft, the Call for Action does not currently contain an explicit reference to both living and non-living marine resources, nor does it recognize the importance of biodiversity, in order to maximize the benefits for sustainable development. We encourage governments to work to insert reference to biodiversity, and living marine resources.
2. Second, we urge that the Call for Action highlight synergies among the various Sustainable Development Goals and their targets. Implementation of activities under SDG 14 will help achieve the targets of many other SDGs. For example, Goal 15 includes a commitment to halt biodiversity loss that is also applicable to marine species, and Target 15.7 specifically calls for urgent action to end poaching and trafficking of protected species. Stakeholders have already made strong commitments on wildlife trafficking through UN General Assembly resolutions and other actions. A large number of marine species are subject to illegal trade, and we thus believe that commitments made in the Call for Action should build on the existing UNGA resolutions and address the illegal trade in marine species (in addition to terrestrial species). We therefore recommend that the Call for Action: (1) include marine species in international and national efforts to combat wildlife trafficking; and (2) include effective implementation of the CITES Convention for marine species, including through enhanced enforcement.
3. Third, we recommend that the Call for Action recognize the need to prioritize activities and resources to benefit the most important resources, and the species and habitats facing the most immediate threats.
4. Fourth, we urge that the Call for Action recognize the increasing threats to whales and other marine species, both within and beyond national jurisdictions, from ship strikes and ocean noise. We recommend that the Call for Action include provisions that: (1) implement the recommendations of the International Maritime Organization (IMO) on shipping routes in order to protect whales from ship strikes and ocean noise, and, when necessary, re-route vessels or

implement speed restrictions within their jurisdictions to minimize risks; (2) generate and utilize the best available science to implement the most responsible means and best practices to mitigate impacts of ships and ocean noise to marine species; and (3) take efforts to recognize ocean noise as a marine pollutant that threatens some species and needs to be addressed.

Specific Comments

WCS recommends the following changes to specific provisions in the Call for Action:

1. In paragraph 1, WCS recommends an explicit reference to “living marine resources,” and recommends adding after “marine resources,” “including living marine resources,” in the sentence. This is consistent with our first point above.
2. In paragraph 6, WCS recommends that the language include reference to taking into account different threats affecting marine resources. This is consistent with our third point above.
3. In paragraph 9, civil society and NGOs should be referenced.
4. In paragraph 14(a), we recommend inclusion of a reference to illegal trade in marine species and their products.
5. In paragraph 14(b), we recommend reference to intergovernmental organizations/treaties, including *inter alia* the Convention on International Trade in Endangered Species of Wild Fauna and Flora, the Convention on Biological Diversity, and the Convention on the Conservation of Migratory Species of Wild Animals, all of which have direct applicability for marine species and SDG 14.
6. In paragraph 14(g), we recommend a reference to noise pollution.
7. In paragraph 14(j), we recommend a reference to the routing of ships and area-based management to minimize ship strikes.
8. In paragraph 14(k), we recommend a reference to marine biodiversity.
9. In paragraph 14(m), after reference to illegal, unregulated, and unreported fishing, we recommend adding “illegal trade in marine species and their products”.