General feedback:

* Australia is concerned about the reference to “other marine megafauna” that is included in several actions and examples. This CMP should focus on Dugongs only, not seek to expand its mandate to other marine megafauna as these species are usually covered through other agreements (Pacific Cetaceans MOU, CMS, IWC etc). If there is a specific reason as to why marine megafauna are included in any action or examples, the reasoning for this should be explicitly explained.
* Paragraph 1 (p.2) and Annex 1: The word “cooperation” is written throughout the text as “cooperation” and “co-operation” / “co-operate”. Use one term consistently throughout the entire document.
* Annex 1, paragraph 1 could be merged with paragraph 4 since both mention the same information. Consider using the wording of the Objectives/Actions-section instead.
* Annex 1, paragraph 6: Unclear what “the context” means; consider rephrasing for more detailed wording. The examples provided in brackets could then be moved to a separate sentence.
* Action 1.1, example b: Consider rephrasing the example, particularly the section “appropriate to national dugong population size and distribution and national institutional capacity”. This section sounds redundant and could potentially be removed to increase the flow of the sentence. The new suggested sentence could be as follows: “Establish **suitable** baseline data collection and monitoring programmes **that follow national regulatory frameworks** to gather information on (…)”. The same applies to Action 2.1 example c and Action 3.1 example b.
* Action 1.1, example d: Determine those populations affected by traditional subsistence and customary use, incidental capture in fisheries and other sources of mortality
  + It should be noted that populations can also be positively affected, so important to make the distinction with this example. Perhaps rephrase to state ‘….those populations **adversely** affected by…..”
* Action 1.1, example e: Conduct socio-economic studies among communities that interact with dugongs and their habitats to support the identification of appropriate responses
  + Not sure what the identification of appropriate responses means. Further clarification would be useful.
* Action1.1, example i: Establish governance and management programmes at levels relevant to national circumstances to enforce legislation concerning taking and trade
  + Not sure exactly how any governance or management programme would enforce legislation. Enforcement of legislation usually relies on capacity and resources. Suggest delete this example.
* Action 1.1, example j: Consider rephrasing the sentence to “Negotiate, where appropriate, management agreements in consultation with other concerned Range States **and relevant stakeholders** in the region”.
* Action 1.2, example a: Unclear what “ecologically relevant scales” means. Consider rewording and/or giving examples. The same applies to other sections within the document, such as Action 1.3, example a.
* Action 1.2, example b: Consider simplifying and/or splitting the sentence in two, as it currently sounds repetitive (repetition in “develop and encourage the use of gears (…) such as the use of alternative gears”).
* Action 1.2, example c: Suggest adding after the comma “and **establish long-term monitoring programs to** measure their effectiveness”. This suggestion may also be applied to other sections that mention “measure the effectiveness of (…)”, where appropriate.
* Action 1.2, example d: Unclear what is meant with “extension programmes”. Consider rewording or defining further.
* Action 1.3, column “Concerned organizations”: Rephrase “Others” for the stakeholders relevant to this objective. This also applies to other sections within the document that mention “Others” in the Concerned organizations column.
* Action 1.3, example c: Suggest deleting the following section in red (redundant) and adding the section in bold- the sentence would be as follows “Establish appropriate management programmes to ensure that anthropogenic impacts are addressed, taking account of **species biology, reproduction and ecology** the temporal and spatial variability of dugong reproductive rates and other impacts on the species.” Temporal and spatial variability is inherent of reproduction and ecology, therefore might not be needed for this sentence. However, feel free to leave it if relevant.
* Action 1.4: Should “illegal trade” also be mentioned in this row?
* Action 1.5, example e: Work with local communities to develop culturally appropriate alternative means of subsistence in areas where the traditional subsistence and customary use of dugongs is permitted to alleviate adverse social and cultural impacts
  + This needs to include **“, where required**” as not all areas that support traditional subsistence and customary use have adverse social and cultural impacts.
* Action 1.5, example f: Negotiate, where appropriate, management agreements on the sustainable level of traditional subsistence and customary use where it is permitted, in consultation with other concerned Range States, to ensure that such use does not undermine ~~traditional~~ conservation efforts
  + Suggest delete traditional as all conservation efforts should not be undermined, traditional or not.
* Action 2.1: Does this conservation tools link work?
* Action 2.1, example c: Consider defining “secondary information”. Also, see comment on Action 1.1, example b.
* Action 2.2, Action cell: Suggest adding “Conduct regular **and long-term** research (…)”. Long-term research is also mentioned in example c.
* Objective 3 and 4 are quite similar and focus on identifying, researching and mitigating threats to important habitat. Some of the actions contained in each (ie Action3.4 and Action4.4) are quite duplicative. Potentially both objectives could be combined into one.
* Action 3.3 and 3.4: Should these Actions be High priority instead of Medium priority, especially considering the prevalent effects of climate change, extreme weather events and anthropogenic impacts on seagrass meadows.
* Action 5.1, Action cell: Suggest expanding to “Establish **communication**, **capacity-building**, education, **participation** and awareness **(CEPA)** programmes (…)”, if appropriate. Consider adding “Dugong MOU Secretariat” to the Concerned Organizations column. Revisit the other Actions in case the Dugong MOU Secretariat could assist with advancing other action items where it had not been included as a Concerned Organization.
* Action 5.1 – Should not include “appropriate to the size of the national dugong populations” as this implies the size of the education program should match the size of the dugong population. This is not necessarily the case – it could be that a country has a very small dugong population, but it is affected by significant number of threats. In that case, a larger education program would be important to ensure optimal outcomes.
* Action 6.2 and 6.3 and 9.1 – should not include reference to “other marine megafauna”. Outside the scope of the Dugong MOU and creates additional, unnecessary expectations and capacity issues.
* Action 6.2, example c: Develop a web-based information resource for dugong and other marine megafauna conservation (including data on populations and on on-going projects) based on information made available by IUCN
  + Very specific and assigned to multiple stakeholder groups. Would argue that only one organisation would need to develop a web-based information resource, not multiple. And why specifically based on IUCN information?
* Action 6.2, example d: similar concerns as to item above. Assume this is directed to Dugong MOU Secretariat, not multiple groups?
* Action 7.3: Consider reordering the examples as follows: b-c-d-e-f-a; since example (a) relates to securing funding, which comes after exploring funding opportunities (examples c-e).
* Action 8.1, example a: Encourage Signatory States that have not already done so to become Parties to CMS
  + Does not belong under this Action. CMS only enlivens the obligation to prohibit the take of Appendix I listed species, not Appendix II such as the dugong. Could be included more appropriately under Action7.4.
* Action 9.1, example b: Do the “community rehabilitation programmes” refer to “habitat restoration”? You might want to define this point further.
* Action 9.1, example d: Unsure what categories or stakeholders “all levels” include. Consider defining this point further.