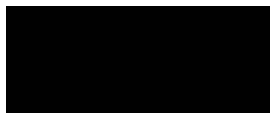


26th March 2015



Dear 

As facilitators of two major coastal programs in Victoria that represent 511 shorebird counters, 10 Friends of the Hooded Plover groups (comprising 420 volunteers) and \$1.6 million dollars worth of investment in coastal conservation per annum, BirdLife Australia wishes to provide feedback common to all three Regional Coastal Plan Drafts 2015-2020. This feedback is detailed below:

Sections 2.1.1 and 2.1.2

Common to each of the regional coastal plans is a lack of recognition of one of the most significant groups of coastally dependent species, shorebirds. At the very least, regional coastal plans need to specifically make mention of the value of marine and foreshore ecosystems to migratory and resident nesting shorebirds; particularly when there are major projects in Victoria working to connect local conservation initiatives and ensure these are regionally cohesive.

While the ecological values of marine environments are highlighted (section 2.1.1), including specific mention of seabirds, there is no mention of the value of reefs and intertidal areas as key foraging areas supporting migratory and resident shorebirds. Under section 2.1.2, foreshore ecosystems, there is a focus on vegetation communities, largely dune based vegetation, yet this gives an impression that the value of sandy areas lies in the vegetation present and overlooks the value of marine subsidies such as wrack and of mobile sand as key elements of this ecosystem. In the foreshore ecosystems section, there should be mention of this ecosystem being the interface between the marine and terrestrial environment, where primary productivity is largely fed by the marine system in the form of wrack deposits. The value of these habitats to nesting shorebirds and seabirds also needs to be highlighted here. There is mention that foreshore environments are popular for human use, which gives the opportunity in this paragraph to highlight the need for balancing recreation in areas where there may be potential conflict with needs of nesting shorebirds and seabirds. If a regional plan fails to highlight these key issues, it fails to support the 930 volunteers working in these coastal areas to protect these values.

BirdLife Australia





Figure 3 would benefit from the addition of:

- Important Bird and Biodiversity Areas (IBA's). These areas are defined based on international and Australian standards of species population numbers and composition. In many countries IBA's have been welcomed as a valuable addition to the National Reserve Network and have received formal recognition, not least because they often have established community support in monitoring and management. IBA's represent irreplaceable habitats for birds but critically have been shown to be hot-spots for biodiversity more broadly. Of 38 Important Bird Areas in Victoria 19 are located at the coast comprising 245,380 ha of prime habitat for birds as well as coastal marine fauna and flora (excel list attached). The large percentage of coastal IBA's (50%) highlights the international importance of Victoria's coastal habitats which the state government aims to recognize and conserve through the production of this coastal plan.
- Priority nesting sites of threatened shorebirds and seabirds (where they are not represented within IBA's), such as Fairy tern colony locations in East Gippsland, Shearwater colony at Griffiths Island Port Fairy, and Hooded Plover priority habitats in Mornington Peninsula, Wilsons Promontory and Bass Coast. These could be denoted by a small shorebird or seabird symbol. These areas specifically would trigger the EPBC Act for coastal works, so would be a worthy addition to this Figure.

A detailed list of IBA's by region is attached, however below are significant areas in each of the regions which would warrant at least notable mention or to be represented in Figure 3.

Western Regional Coastal Plan 2015-2020 Draft

- Warrnambool – Little Penguin colony
- Port Fairy to Warrnambool - Important Bird Area and Priority Hooded Plover habitat
- Griffiths Island Port Fairy – Short-tailed Shearwater colony
- Portland – Australasian Gannet colony

Central Regional Coastal Plan 2015-2020 Draft

- Mornington Peninsula – Priority Hooded Plover habitat

Gippsland Regional Coastal Plan 2015-2020 Draft

- Wilsons Promontory – Priority Hooded Plover habitat
- Snowy river mouth, Marlo – Fairy tern breeding colony
- Lakes Entrance barrier islands – Fairy tern breeding colony
- Phillip Island – Little Penguin colony



Amenity values: Section 2.2.2

The presence of wildlife is one of the key factors that makes the coast attractive to users (see attached article), and yet Figure 4 reveals that there is a considerable knowledge gap in public perception of what constitutes as habitat. Vegetation, such as mangroves and sea grass beds, are highlighted as habitats, and yet it is the sandy beaches, rocky reefs and intertidal areas that have some of the highest habitat values for wildlife that are visible to beach users, and yet the coastal plan and the amenity values figure, leave the false impression that vegetation is the only factor linked with wildlife on coasts. This is of concern as this document is an opportunity to convey and overcome key misperceptions about coastal ecosystems. We hope that this will be rectified.

Section 2.4 Protecting coastal values

We would like to see specific mention under Community Coastal Values – Environmental: Resident shorebird and seabird nesting areas. These are highly valued by coastal communities (e.g. 420 volunteers participate in the monitoring and protection of Hooded Plovers for example) and are not currently captured by the features listed.

It is also worth recognising here that large segments of the community value areas of beach free from more intrusive types of recreation (e.g. vehicles, kite-surfing, jet skis), see Maguire et al. 2011 attached.

Section 7. Supporting communities caring for the coast.

Each time the coastal strategy and coastal plans come up for comment, we provide feedback that Non-government Organisations are not currently mentioned in the documents. Given BirdLife Australia engages 930 volunteers along the Victorian coast, established and supports 10 Friends of the Hooded Plover community groups, and generates \$1.6 million dollars of in-kind investment into coastal on-ground action per annum, it is really disappointing to see that we still are not recognised as a key organisation active on the Victorian coast. Furthermore, when Coastcare surveyed participants in the Summer by the Sea program, they found that beach-nesting birds were one of the main coastal issues that participants were aware of and showed a connection with. BirdLife Australia has fostered coastal appreciation and led a massive education effort in Victoria for the past nine years which is resulting in more sustainable beach use attitudes and behaviours. This has in part been supported by Victorian Government funding and could be a success story for the state's conservation efforts in general.

If you require any further information or would like to discuss this feedback further, please do not hesitate to contact me on [REDACTED]

Yours Sincerely,

[REDACTED]

[REDACTED]