



PO Box 295 Vincentia NSW 2540 | [www.birdlifeshoalhaven.org](http://www.birdlifeshoalhaven.org) | [shoalhaven@birdlife.org.au](mailto:shoalhaven@birdlife.org.au)  
BirdLife Shoalhaven is a branch of BirdLife Australia Limited ABN 75 149 124 774

**SUBMISSION to SHOALHAVEN CITY COUNCIL  
DRAFT DESTINATION MANAGEMENT PLAN 2018-2023**

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**Rob Dunn**  
President BirdLife Shoalhaven  
[president@birdlifeshoalhaven.org](mailto:president@birdlifeshoalhaven.org)  
0438 250600

**Chris Grounds**  
Conservation Officer BirdLife Shoalhaven  
[solum306@gmail.com](mailto:solum306@gmail.com)  
0401137158

A handwritten signature in black ink, appearing to read "Rob Dunn", is placed over a light grey rectangular background.

*Chris Grounds*

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## INTRODUCTION

**Birdlife Australia (BLA) is Australia's largest bird conservation organisation with over 110,000 members and supporters. For over a century its members have protected birds and their habitats, through practical conservation and advocacy based on the best available science. BirdLife Shoalhaven (BLS) is a branch of BirdLife Australia with over 600 members and supporters. The major part of our charter is to advocate for the conservation of birdlife in the Shoalhaven.**

### SECTION A ENVIRONMENT

#### 1.00 Environmental Advocacy

**BLS acts in advocacy for the conservation of birdlife and habitat with a Shoalhaven focus and our concerns related to the impact of tourism on birdlife continue, especially in the Shoalhaven coastlands and specific sites within the coastlands. BLS would expect that the DDMP should have addressed these concerns.**

**1.10** BLS as a branch of BLA has an established position in advocating for the conservation of birdlife and habitats, including with Shoalhaven City Council.

**1.20** In the context of the Shoalhaven, which is characterised very much in terms of tourism, this necessarily involves the consideration of the impact of tourism on the birdlife and its habitats.

**1.30** Further, in that Shoalhaven Tourism has a strong orientation to the coast and its beaches, the birdlife in these habitats is of special concern, particularly with shorebirds and threatened species.

**1.41** This then extends to related issues of use of habitat coastland including beaches, crowding and associated disruption and chronic dog use issues.

**1.42** The conflict represented in tourism interests acting in denial of the legislated interests of threatened species and the governance and management responsibilities of Shoalhaven Council to shorebirds on Shoalhaven coasts is the exemplar of the management process applied to Cudmirrah Beach July 2018. Despite a known record of breeding shorebirds a decision was taken to allow "off-leash dogs". That subsequently had to be reversed, with the agreement of all councillors, when it was revealed the information originally provided was seriously in error and totally contrary to the advice provided by the Office of Environment and Heritage through the Minister.

**1.50** The NSW Government "Save Our Species" project has a high profile operation throughout the Shoalhaven with about 100 volunteer community members. This project has a focus on four specific species: Hooded Plover (Critically Endangered), Pied Oystercatcher (Endangered), Sooty Oystercatcher (Vulnerable) and the Little Tern (Endangered). The most recent NPWS Conference of this volunteer group with NPWS staff at Ulladulla indicated, quite strongly, that there are specific problems related to tourism in the experience of working for shorebird conservation.

**1.61** Additionally, using the Jervis Catchment Management Authority [CMA] region as a base, there are no less than 47 threatened species listed for that part of the Shoalhaven.

**1.62** The Shoalhaven embraces four Key Biodiversity Areas identified by BirdLife Australia and international partner organizations. Two of these, Lake Wollumboola K.B.A. and Jervis Bay K.B.A., are exclusive to the Shoalhaven L.G.A. and both are the subject of excessive tourism pressures at particular times.

**1.63** The Shoalhaven Heads-Estuary area is a recognized bird biodiversity hotspot and E-Bird lists over 150 individual species. This area is also a major Warm seasons venue for international migratory species such as the Critically Endangered Eastern Curlew.

**1.70** The failure to provide an adequate profile to both visitors and residents is also reflected in the Shorebird Item in the December 20<sup>th</sup> Community Newsletter "In Your Neighbourhood". BLS discussed this with a senior council staffer and concurred that the item did not meet reasonable standards of information.

**1.80** The specific examples cited above reflect that sufficient advice is not being sought or generated from BLS itself, the NPWS or within council on these sort of matters despite the existence of both Environmental Services Section and Environmental Planning staff, who can and should advise on such matters.

## **2.00 Concerns with DDMP Characterisation of Environment**

**The DDMP does not come to terms with an adequate concept and profiling of natural environment despite its characterisation as one of the "pillars" of 'healthy tourism'. If tourism continues to the short term future with this problem there will be an unacceptable and growing gap in the commitment of tourism to natural environment. In part, this will associate with negative impacts on birdlife and habitat. One of the serious concerns that exists with tourism in the Shoalhaven is the growing and continuing impact on the natural environment, which aligns with growth expectations in tourism.**

**2.10** The characterisation of environment in the DDMP does not provide an adequate concept of environment as context for birdlife and habitat, which requires biodiversity perspective.

**2.20** The concern with habitat is exemplified on Page 11 of the DDMP as it notes the "Implementation Status" of "Key Areas" and the table lists "Vegetation" without any descriptor but reveals that it rates exceptionally low with a 14 / 15 ranking and is considered a "Low Priority". Vegetation is associated with higher order concepts of biodiversity, ecology, habitat and corridors for wildlife and for birdlife. Clearly, that indicates a particular problem in this Key Area. The clearing of vegetation in urban areas, which acts as impotent birdlife habitat and corridor is of particular concern.

**2.30** The DDMP notes on Page 42 Table 1.11 *“the region is not yet at serious risk of any impacts causing irreversible consequences”*. Would not the science position on climate change contradict that comment as would the fact that NSW has just recorded the hottest year on record (BOM Annual Report), Australia the hottest January on record, new historical records of heat durations and maximum temperatures, recognition of new bushfire regimes and the worst Darling River system fish kill on record. The DDMP is a naïve comment, which requires rewriting or deletion. The Shoalhaven is at serious risk of irreversible consequences of the impact of climate change but of course it is not exclusive to our area.

**2.40** The error noted in 2.30 is compounded on Page 56 when the DDMP in a “Key Risks” section notes “Weather (inc. Climate Change) and Natural Disasters” and rates these as “possible”. Climate Change is the overarching or umbrella concept, one element of which is the recognized developing new patterns of weather, e.g. the 2018-2019 Heat Wave, which has produced a number of all time temperature records. The associated descriptor suggests that in fact it is seasons that is actually of concern for tourism. There is some confusion!

**2.50** The term sustainability is used often in the document but is only taken to mean sustainability of tourism, tourism business, tourism growth or growth of visitation. This is a flawed perspective that neglects environmental sustainability yet environment is pitched in the Shoalhaven 360 Model as one of the ‘pillars’ of tourism management and is also recognised as one of the outstanding, key attractions for tourism in the Shoalhaven but does not appear to attract the application of sustainability thinking.

**2.60** It is known among our members and NPWS Volunteers that the ‘Pet ‘Friendly’ tourism promotion has impacted adversely on the bird habitat and can be very disruptive. Birders are generally not supportive of the “Unspoilt” and “Pet Friendly” promotions.

## **SECTION B BIRD TOURISM**

**One of the ways in which BirdLife Shoalhaven advocates for the conservation of birdlife and habitat is through bird education and birdwatching activities. Given the amazing birdlife in the Shoalhaven and the unique experiences birds provide for visitors, BLA would have expected the DDMP to give greater recognition of the full potential of bird tourism.**

### **3.0 The potential of bird tourism in the Shoalhaven**

**3.10** The Shoalhaven is a mecca for birdwatchers. Its many different habitats often in intact, rugged, remote landscapes, support over 200 varied species. As well as amazing avian diversity the Shoalhaven has a number of threatened species, both resident and migratory. In addition, it contains two globally recognised K.B.A.s, as mentioned above. The easy access to excellent ‘birding’ sites and bird walks just a short distance from the Princes Highway is another important consideration and adds to the experience.

**3.20** For all these reasons, the Shoalhaven is recognised as an outstanding ‘birding’ area, attracting constant and regular visitors in all seasons both from the local area and regions, Sydney, Canberra and elsewhere in Australia and increasingly from overseas. This was evident with the success of the inaugural Bird Haven Festival in Shoalhaven Heads in October 2018, which attracted over 100 people. A number of participants travelled from Sydney, Illawarra and Canberra. Plans are already underway to make this a much larger event this year.

**3.30** This potential is often not recognised as there are not many specialised birding tour operators across Australia and they are mostly limited to remote locations. Also, birders tend to be self-reliant, already connected with birding networks and have their own equipment. Birders are primarily retirees and grey nomads. This is not identified on the DDMP table on key demographic characteristics of the domestic markets for the Shoalhaven region.

#### **4.0 Leveraging the potential of bird tourism**

**4.10** Last year Council staff supported bird tourism with the publication of an excellent Bird Walk brochure in consultation with BLS. A further print run was required which proves the demand and interest in birds. This is recognised on page 18 of the DDMP. Council also provided \$1,000 to support last year’s Bird Haven Festival. We are also working with Council on the construction of a bird viewing platform at Lake Wollumboola and birds hides at Burrill Lake with Local Land Services. These are positive first steps to build upon.

**4.20** However, Council’s other promotional material and on-line presence is notable for the absence of bird images and information. The current Shoalhaven Many Experiences – One Destination brochure has just one image of a bird and that is an Azure Kingfisher, which most visitors would fail to see. There are 13 other wildlife images. There are just as many of dogs. Surely this is the wrong balance with the environment as one of the four tourism pillars. The situation is much the same on-line and the mapping tool does not show the bird walks from the brochure.

**4.30** Of greater concern there is no mention on-line of the need for the protection of migratory shorebirds and beach nesting birds and limited and misleading information on dog on/off/no- lease beaches and sites, (e.g. no off-lease time restrictions).

**4.40** The above issues can be easily addressed with a new combined bird walk and bird guide, interpretative signage at key birding sites, upgrades to viewing platforms and new bird hides, a review of tourism material and on-line presence to include appropriate bird images and bird conservation information and increased support for the Bird Haven Festival.

**4.50** BLS is keen to work with Tourism staff on these issues, as part of the DDMP’s action plan to Support Destination Marketing - Maintain strategic focus on creating new, rich content assets to promote the region.

## **CONCLUSION**

The DDMP includes visitation numbers, which are already out-of-date. It includes no forecast for the numbers over the next five years, which is a clear short-coming. This summer has shown that more than ever Shoalhaven tourism is having major impacts on the environment and the quality of the visitor experience. If tourism and the environment is at breaking point now, what will it be like over the next five years? As stated in section A this must be addressed.

It might seem contradictory that we are also highlighting bird tourism in section B. However, bird tourism is already happening, but is largely not appreciated or understood, so it will not significantly increase visitor numbers. But it will add greatly to the visitor experience in the enjoyment of nature, help visitation outside peak periods, support one of the four pillars of tourism, while at the same time contributing to bird conservation and environmental sustainability.

BirdLife Shoalhaven awaits your response on these issues in the finalisation and implementation of this important five-year plan for tourism.