Gippsland Environment Group
Paynesville, VIC 3875

26/01/2023

Attention: Tanya Plibersek, Minister for Climate Change, Energy, the Environment and Water

RE: Latham's Snipe, an EPBC-listed migratory bird species threatened by proposed residential coastal development in Paynesville, East Gippsland

Dear Minister Plibersek,

We write to you regarding a newly proposed foreshore residential subdivision at Point Fullarton in Paynesville (East Gippsland), situated directly adjacent to the Ramsar wetlands of the Gippsland Lakes Reserve (see Map 1). This development threatens an EPBC-listed migratory bird species, the ***Latham's Snipe*** and the ***Gippsland Lakes Ramsar Reserve***.

The proposed development site and adjoining Ramsar wetlands contain nationally significant populations of Latham's Snipe. The presence of Latham's Snipe was not known in 1982 when the Council decision was made to rezone the farmland into a General Residential Zone. Similarly, the most recent Victorian Department of Environment Land Water & Planning (DELWP) planning approval makes no reference to Latham's Snipe, nor the significance of the roosting habitat situated *within* the development site's boundaries. DELWP was seemingly unaware the site contained nationally important habitat for the snipe, and did not request an EPBC referral for a Commonwealth Impact Assessment. The planning application is still currently awaiting a council decision, probably around March 2023.

EPBC Act:
As this is a matter of national environmental significance under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), we request that you and/or the Department of Climate Change, Energy, the Environment and Water (DCCEEW) be involved in the assessment and approval of this project.

In brief:

1. According to Dr Derek Russell (BirdLife East Gippsland), circa 50% of the subdivision site comprises roosting habitat for Latham's Snipe. Latham's Snipe have been recorded at the Point Fullarton wetlands and the adjacent subdivision site for many years, with the last two surveys counting 40 (Nov 2022) and 15 (Jan 2023) birds respectively. Latham's Snipe is listed as *Vulnerable* in Victoria and *Near-Threatened* nationally, and are at risk due to habitat loss along their migratory route.

2. Dr Birgita Hansen, Research Fellow at Federation University Australia, is currently leading the National Latham's Snipe Project Group, investigating the ecology and conservation of Latham's Snipe.

   In her letter to council regarding the proposed subdivision she stated:

   a) Latham's Snipe use the Point Fullarton wetlands and adjacent fields [located wholly within the proposed subdivision site] throughout their non-breeding season in Australia (mid-spring to early autumn) before migrating back to Japan for the breeding season.

b) Point Fullarton wetlands and its adjacent fields is one of only eight snipe sites in the Shire of East Gippsland to support nationally significant numbers of Latham's Snipe (i.e. more than 18 birds).

c) Development of residential housing on and adjacent to this area is likely to impact on the snipe population through loss of suitable wetland habitat for daytime roosting birds, and disturbance to roosting and feeding birds from human activities.

3. Climate change events: sea level rise, coastal inundation, erosion and extreme natural events (storms, tides and drought) represent an existential threat to the Fullarton wetlands, and all coastal Ramsar sites worldwide. Most of the Point Fullarton Ramsar site is projected to be inundated by a 20cm sea level rise by 2040 (see map 2). Moreover, the muddy intertidal flats of the Fullarton wetlands are extremely erodible, with an Erosion Susceptibility Score of 5[1]. The highly erodible soils serve to further compound the climate change risks to the wetlands, with the Point Fullarton's shoreline scoring a Very High Shoreline Erosion Susceptibility rating, the highest possible[2]. As the existing wetlands gradually erode and disappear under the sea, the subdivision's infrastructure (swales and retention dams) will reduce tidal flows, whilst the roading and housing lots will impede future wetland migration to adjacent higher ground. As vegetation succumbs to submergence by rising sea levels on the seaward edge of the wetlands, the foreshore wetlands prevented from inland migration will decrease in area, if not disappear completely, possibly as early as 2040. Given that the more elevated eastern portion of the site has already been compromised by acidic soils dumped during the construction of the nearby canals, only a slither of land suitable for wetland recolonisation or migration remains within the existing Ramsar boundaries (see map 3). The best wetland migration pathway will therefore be to retreat south of the Ramsar site, onto land currently proposed for housing development.

4. By 2100 the proposed subdivision's stormwater infrastructure will also be partially submerged by projected sea level rise and storm surges, greatly impacting its capacity to treat freshwater runoff (see map 4). The Ramsar wetlands will be squeezed in between rising sea levels and the proposed housing estate, reducing the extent of wetlands to a fraction of their existing area. The high conservation values of the site and adjacent wetlands necessitate a far wider adaptation buffer being applied than what is currently proposed.

5. The coastal squeeze of the Ramsar wetlands against the residential subdivision will greatly reduce the roosting and foraging habitat of the Latham's Snipe (and other wetland dependent species); threatening both the snipe and the ecological character of the wetlands itself.

Environmental Significance of the Area

According to an EPBC Act Protected Matters Report prepared for the proposed Fullarton development site (report attached), there are 57 Listed Threatened Species and 35 Listed Migratory Species that are known to occur, are likely to occur or may occur within a 1km radial buffer of the development site (see Protected Matters Report map).

1 DEPI (2014) *Gippsland Lakes/90 Mile Beach Coastal Hazard Assessment Project – Lake Shoreline* p.21

2 DEPI (2014) *Gippsland Lakes/90 Mile Beach Coastal Hazard Assessment Project – Summary* p.29

Of the species that are confirmed or known to be within the study area:

- 3 are listed as **Critically Endangered**: the Eastern Curlew, Swift Parrot, and Curlew Sandpiper

- 3 are listed as **Endangered**: the Red Knot, Australasian Bittern and Gang-Gang Cockatoo

- 8 are listed as **Vulnerable**: the White-throated Needletail, Fairy Prion (southern), Australian Fairy Tern, White-capped Albatross, Eastern Hooded Plover, Australian Grayling, Grey-headed Flying-fox, White Shark (nursery area)

For all the reasons stated in this letter, the Gippsland Environment Group requests that you and/or DCCEEW be involved in the assessment and approval of this project.

Sincerely,

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