

**The Hon. Lily D'Ambrosio MP**  
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**Minister for Energy, Environment and Climate Change**  
**Level 16, 8 Nicholson Street**  
**East Melbourne Victoria, 3002**

Dear Minister D'Ambrosio,

**Re: Commercial Horse Training in the Belfast Coastal Reserve**

I am writing to express my disappointment at your government's proposal to allow commercial racehorse training in the Belfast Coastal Reserve, (BCR), in south west Victoria.

Given the serious concerns regarding the threat to resident and migratory coastal shorebirds that are vulnerable to extinction, I find the proposal to consider allowing up to 250 commercial racehorses to train in the Belfast Coastal Reserve, as reprehensible and without precedent. One horse, doing commercial training in such a sensitive area, is one too many.

Added to these concerns are the anxiety about public safety, damage to a fragile environment, the intention to use public commons for large-scale commercial activities and the presence throughout the Reserve of Aboriginal sites of cultural significance.

I have no confidence in the Draft BCR Coastal Management Plan as there has been no comprehensive Environmental Survey or Cultural Heritage Survey conducted. The local Gunditj Mirring have said 'No' to allowing commercial racehorse training in the BCR and Eastern Maar have yet to give approval. Native Title determinations in that region have yet to be finalised.

Given Racing Minister Pakula's recent pre-emptive comments that, "The government will continue...to ensure training on beaches is a sustainable practice into the future", it would appear that the outcome is a 'done deal' and I have no confidence in the scientific integrity, impartiality or independence of your government's BCR Coastal Management Plan.

Your draft proposal to allow commercial racehorse training in the BCR, at any level, is completely contradictory to the intended purpose of the Reserve and a host of past and present studies, recommendations and Federal and State Acts of Parliament that include, but are not limited to: The VCC guidelines, LCC Recommendations, Threatened Species Strategy, your own Protecting Victoria's Environment-Biodiversity 2037 Plan, the Wildlife Act, the Flora and Fauna Guarantee Act, the Coastal Management Act and the Crown Land Reserves Act. There are also international obligations under existing RAMSAR Treaties.

At a time when the extinction of species is running at such extreme levels, it is negligent of you, as the responsible minister for the environment, to sanction such willful damage to our natural world. This is the wrong legacy to bequeath future generations.

Horses are not under threat of extinction but our coastal shorebirds are. Commercial horse training is not a coastal dependent activity but shorebird breeding is. There is no commercial benefit to such an activity. Disallowing commercial racehorse training from the BCR will have no impact on the economic benefit to the region.

I call on you to change course, to respond responsibly and imaginatively, with purpose built facilities for trainers and declare the Belfast Coastal Reserve a Coastal Park, or equivalent, under National Parks legislation, with associated regulations to protect and preserve it for future generations.

Yours Sincerely,

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