Address for Correspondence
South East City Residents Association Inc
Attention: RD McEvoy
PO Box 6290
Halifax Street
Adelaide, SA 5000
Australia

secra.sa@gmail.com

Mr. Jorge Viegas,
President FIM – Fédération Internationale de Motocyclisme 11,
Route de Suisse
1295 Mies
Switzerland

July 30, 2026

Request for an Independent Environmental Impact Assessment of the Proposed Adelaide MotoGP Street Circuit

Dear Mr Viegas,

We are a coalition of South Australian citizens and organisations writing to express our deep concerns regarding the environmental impacts of the Adelaide MotoGP street circuit proposed for the city of Adelaide.

We base our assessment of the impacts on available information about the alignment of the track, runoff areas and pits area presented by the South Australian Government on 19th February 2026 (Attachment 1). The runoff areas (yellow) are estimated.

The proposed MotoGP street race will be conducted in Adelaide's nationally heritage-listed Park Lands - one of the world's finest surviving nineteenth-century "city in a park" landscapes. Approximately 40% of the circuit will be situated within the Park Lands itself where large amounts of new hard surfacing will permanently replace existing green space and protected habitat. The racetrack will cut through a stand of 100 or more years-old *Eucalyptus* trees and a 150-year-old olive grove. It will encroach on a protected Key Biodiversity Area, which includes a nationally endangered woodland and grassland, a conservation area for the rare Chequered Copper butterfly (*Lucia limbaria*), a complex wetland ecosystem and a 130-year-old closed woodland.

There is strong and growing opposition to locating the MotoGP in Adelaide's precious green and nature space. Opposition has been expressed through a paper petition

(currently 28,000 signatures, triggering a parliamentary inquiry), an online petition (over 50,000 signatures), rallies and via social media. Community concerns include:

- Permanent damage to the National Heritage-listed Adelaide Park Lands, a cherished and globally unique civic asset that has been protected from development since the founding of our city 190 years ago;
- Almost zero transparency about the official track alignment, likely impacts and financial cost of constructing the MotoGP infrastructure;
- Lack of adequate community consultation and public debate.

We wish to alert you specifically to the fact that the construction of the proposed Adelaide MotoGP infrastructure, and the event itself, is in breach of the *FIM Environmental Code 2026* and the *FIM Sustainability Policy*.

The *FIM Environmental Code 2026* section 4.2 "Protection of Biodiversity" states that FIM and its affiliates will *"When building facilities near or in vulnerable areas take into account the protection and promotion of biodiversity", "organise the event in accordance with the local laws and in coordination with the environmental authorities in order to find the best places that don't disturb the biodiversity"* and will "*respect and observe the principles of the Sports for Nature Framework*".

The *FIM Environmental Code 2026* goes on to say *"As signatories of the Sports for Nature Framework, the FIM-affiliated members, promoters and organisers, as well as members of the FIM family are called to make contributions to Nature and work towards four principles…"* The first listed principle is to *"Protect Nature and avoid damage to natural habitats and species."* followed by the statement that *"Our organisation is committed to protecting and avoiding damage to natural habitats and species, including respecting protected areas."*

Furthermore, the *FIM Sustainability Policy* contains the following provision:

> *"We believe that sport should act as a role model and serve as a showcase to promote values and good practices, representing a significant contribution to the development of education, social cohesion, health and wellbeing and sustainable development.*
>
> *The FIM is committed to developing and promoting a sustainability programme to enhance its positive impact on the environment and society and reduce any possible adverse effects.*
>
> *The FIM's goal is to establish a culture of sustainability in motorcycle sport worldwide. In order to achieve this, we will:*
>
> - *Continue to foster an Environmental Protection Programme.*

- *Comply with all relevant legislations, regulations, policies, local laws and site agreements designed to protect the environment.*
- *Monitor advances in technology and environmental best management practices and apply them as appropriate.*
- *Continue developing Environmental Regulations and Guidelines and seek improved options aiming to reduce the potential for adverse environmental impacts concerning*
    - *Sound emissions*
    - *Soil and groundwater contamination*
    - *Emission into the air*
    - *Protection of biodiversity*
    - *Protection and promotion of cultural heritage"*

The Adelaide MotoGP is inconsistent with the *FIM Environmental Code 2026* and the *FIM Sustainability Policy*

1. **The proposed Adelaide MotoGP will cause damage to natural habitats and species by**:

    a) Removing up to 200 trees, including approx. 45 "significant" trees (trunk circumference ≥ 2 m), many over 100 years old, that provide nesting (e.g. in the form of hollows) and/or foraging habitat for at least seven native mammals[1][2], approx. 20 native birds, several reptiles and many invertebrates, including threatened species such as:

    - Grey-headed Flying Fox (nationally vulnerable)
    - Brushtail Possum (state rare)
    - Yellow-tailed Black Cockatoo (state vulnerable)

    The removal of large old trees is contrary to conserving biodiversity. The proposal to replace 100–150-year-old trees with three native saplings per tree does not compensate for the ecological loss: mature trees provide habitat, carbon storage, cooling, and biodiversity functions that saplings cannot replicate for many decades.

    b) Removing approximately 14% (3,340 m^2) of a remnant area of the nationally endangered *Grey Box (Eucalyptus microcarpa) Grassy*

[1] Long, M. (2003). *A Biodiversity Survey of the Adelaide Park Lands, South Australia in 2003*. Department for Environment and Heritage, South Australia.
[2] City of Adelaide (2024). *Biodiversity Survey Summary Report 2024*. City of Adelaide, South Australia.

Woodlands and Derived Native Grasslands of South-Eastern Australia[3], which will be covered by bitumen and gravel for the track and run-off area;

c) Through (b), destroying habitat for a rare butterfly, the Chequered Copper (*Lucia limbaria*), rediscovered in the Park Lands in 2011 after having been presumed locally extinct for over 60 years;

d) Transmitting loud motorcycle noise in the peak bird breeding season to the nearby Pakapakanthi Wetlands (Attachment 2), where 87 native bird species have been recorded[4], causing behavioural changes: fright-and-flight responses, disrupted foraging, and temporary hearing impairment affecting vital conspecific vocal communication[5]. Breeding is likely to be affected in highly noise-sensitive birds such as the Little Grassbird, Australian Reed-Warbler and Hoary-Headed Grebe.

e) Similar noise impacts are expected in mammals and birds that nest in trees close to the proposed track (i.e. those referred to in (a) above).

2. The proposed Adelaide MotoGP does not respect protected areas.

a) The International Union for Conservation of Nature (IUCN) defines a Protected Area as:

> *A clearly defined geographical space, recognized, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values.*

The Key Biodiversity Area referenced above—one of several designated across the Park Lands by the City of Adelaide—has a primary management objective of biodiversity conservation. It therefore meets the criteria of a Protected Area, yet the proposed MotoGP development would directly damage it and threaten the wildlife it supports. More broadly, the conservation of biodiversity is a management objective of equal weight to other objectives, such as recreational use, over the entirety of the Park Lands

A referral for a "controlled action" decision under the EPBC Act for impacting the endangered grassland provides a legal opportunity for

[3] https://www.dcceew.gov.au/environment/biodiversity/threatened/publications/grey-box-eucalyptus-microcarpa-grassy-woodlands-and-derived-native-grasslands-south-eastern

[4] eBird (2026). *Pakapakanthi Wetlands Bird List*. Last updated July 2026, Accessed 26/07/2026. Cornell Lab of Ornithology, Cornell University. https://ebird.org/hotspot/L19181440/bird-list

[5] see Dooling, R. J., Buchler, D., Leek, M. R. and Popper, A. N. (2019). The Impact of Urban and Traffic Noise on Birds. *Acoustics Today* **15**(3): 19–27.

groups and individuals to comment on and oppose the development; potentially delaying development for uncertain periods of time. The opposition to this development is large and growing and there will be coordinated effort to leverage the legislation to prevent degradation of the conservation values.

3. **The proposed Adelaide MotoGP undermines social cohesion, health and wellbeing and sustainable development.**

    a) The MotoGP is a highly divisive project that is presented by its proponents as a false binary of major events, and the economic benefits they bring, versus those who are concerned about the impacts to the Park Lands. This is causing increasing tension in the community that unfortunately seems likely to intensify. In reality, there are many sporting and cultural events that occur in the Park Lands each year that do not cause permanent damage and have broad community support.

    b) The MotoGP infrastructure will convert 63,500 m^2 (15.7 acres) of lawns, playing fields, playgrounds, remnant grassland, trees, walking/cycling trails and similar civic green space into bitumen and gravel beds. This will exacerbate urban heat effects in a city that is already prone to severe heatwaves, with likely implications for human health and wellbeing, and biodiversity. It is the precise opposite of what is required for climate change adaptation.

4. **The proposed Adelaide MotoGP does not comply with all relevant legislation, regulations, policies, local laws and site agreements designed to protect the environment.**

    a) By requiring the removal of approx. 45 significant trees (trunk circumference ≥ 2 m), the project requires that the State Government exempt itself from the state *Planning, Development and Infrastructure Act 2016* that protects significant trees.

    b) A Key Biodiversity Area within the Park Lands, designated by the City of Adelaide (Council), will be directly damaged or impacted through excessive noise (see 1(b-d) above).

    c) By clearing an area of remnant nationally endangered *Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-Eastern Australia* (see 1(a) above), the project will be

referred under the federal *Environment Protection and Biodiversity Conservation Act 1999*.

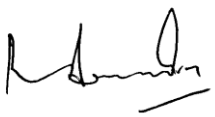
It should be noted that the MotoGP proposal is being advanced by the South Australian Government under the *South Australian Motor Sport Act 1984*, legislation originally designed to exempt the Formula 1 Grand Prix and other major motor sport events from key local and state regulations. As a result, the project is positioned outside the standard protections of the *Environment Protection Act 1993* and the *Planning, Development and Infrastructure Act 2016*, which ordinarily govern environmental noise limits and the removal of mature trees.

Under these exemptions, the Government intends to override both Adelaide City Council by-laws and state laws to permit the clearing of 45 "significant trees" (> 2 m in circumference) for the Adelaide MotoGP street circuit. Furthermore, despite FIM's stated aspiration to reduce motorcycle noise in the future, thousands of residents living in suburbs adjacent to the proposed track would be exposed to motorcycle noise exceeding 60 dB—levels that South Australian legislation and local government ordinances recognise as causing substantial loss of residential amenity.

The level of concern of many South Australians about the environmental impact of the circuit is likely to mean that civil protest action will continue up to and during the MotoGP event should it proceed. Furthermore, the lack of government consultation with citizens means there has been an erosion of public trust. This may affect the social licence for the MotoGP street circuit. We submit that this poses a long-term reputational risk for FIM, the MotoGP brand, Liberty Media and the MotoGP Sports Entertainment Group, and a risk to the future of an Adelaide MotoGP under future democratically elected governments.

We ask the FIM to request an independent, publicly available Environmental Impact Assessment of the proposed circuit and related infrastructure before engaging further with the South Australian government on construction.

Yours Sincerely,



E/ Prof R. Doug McEvoy AM,
South East City Residents Association

Ben Taylor, Ecologist

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Steven Langley
President, BirdsSA

Mat Monti
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Mr. Carmelo Ezpeleta,
CEO MotoGP Sports Entertainment Group, S.L.

FIM Environmental Commission
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Corporate Communications Department
MotoGP Sports Entertainment Group

FIM Board of Directors FIM – Fédération Internationale de Motocyclisme

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Prof Chris Daniels
CEO – Green Adelaide

Mr Andrew Daniels
Chair - SA Motorsports Board

Mr Mark Warren
CEO - SA Motorsports Board

Attachment 1 – Best available map of the proposed Adelaide MotoGP circuit showing track (black), runoff areas (yellow) and pits area (white)

Attachment 2 – Showing proximity of the MotoGP racetrack to the Pakapakanthi Wetlands

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Mr. Jorge Viegas,
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1295 Mies
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August 22, 2026

Request for a Meeting with FIM – Fédération Internationale de Motocyclisme to discuss the Adelaide MotoGP street race proposal

Dear Mr Viegas,

We are writing to express our disappointment at not yet receiving a response to our letter of 30 July, entitled "Request for an Independent Environmental Impact Assessment of the Proposed Adelaide MotoGP Street Circuit." In light of the seriousness of the issues raised, we respectfully request a meeting with you or your delegates.

We acknowledge FIM's stated commitment to environmental responsibility and recognise the organisation's recent achievements in advancing sustainability within motorsport. We also want to be clear: we are not opposed to MotoGP. Like many Australians, we are proud of the nation's motorcycle racing history and our past world champions (e.g. Wayne Gardner, Mick Doohan and Casey Stoner). We want MotoGP to thrive in Australia.

Our concern is with the race's location

The Adelaide MotoGP proposal would place permanent motorsport infrastructure within Adelaide's National Heritage-listed Park Lands, a landscape that has remained substantially intact for almost 190 years. Based on the South Australian Government's published plans, the development would remove up to 200 mature trees, including around 50 ancient trees, damage ecologically significant habitat, and convert more than 63,000 square metres of public parkland into racetrack and gravel runoff areas.

The Adelaide MotoGP proposal clearly contravenes FIM's environmental standards.

We do not want FIM to weaken its standards. We are asking FIM to uphold the standards it has already adopted through its Environmental Code, Sustainability Policy and commitment to protecting biodiversity, cultural heritage and protected areas.

Particularly important is that the project is being advanced under legislation that exempts it from the normal planning and environmental assessment processes that would ordinarily apply to a development of this scale. There has therefore been no comprehensive, independent Environmental Impact Assessment. We respectfully suggest that this makes independent scrutiny by FIM more important, not less.

We understand that Liberty Media's ambition to establish the first modern-era MotoGP city street circuit presents significant challenges. Melbourne has already declined the opportunity; rider safety concerns remain; and many MotoGP fans are sceptical. In Adelaide, thousands of residents are already deeply concerned about increased noise, road closures and congestion.

Beyond these issues, the decision to locate the race within Adelaide's National Heritage-listed Park Lands has greatly heightened the level of community concern. As outlined, the proposed works will destroy mature trees and damage ecologically significant habitats, including the Grey Box grassland and the Pakapakanthi wetland. The race will generate extreme noise adjacent to breeding sites for birds and butterflies.

Community volunteers have invested many thousands of hours over the years in protecting these threatened biodiverse ecosystems. South Australians deeply cherish the Adelaide Park Lands.

It is not surprising therefore that public concern continues to escalate. In the three weeks since our last correspondence, petition signatures to halt works on the MotoGP redevelopment have risen from 28,000 to 43,000 and have triggered a parliamentary enquiry.

There is also a wider issue for FIM. Decisions concerning flagship MotoGP events inevitably establish precedents for promoters and organisers around the world. FIM's response to Adelaide therefore provides an opportunity to demonstrate that its environmental commitments are meaningful standards that genuinely influence decision-making when significant environmental impacts are at stake.

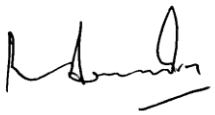
The fundamental question is simple: can permanent environmental damage to one of the world's most significant historic urban park systems be reconciled with FIM's commitment to environmental leadership?

We believe that question deserves independent examination before irreversible works proceed.

We would appreciate the opportunity to meet with you and/or representatives of FIM's Environmental Commission, Sustainability Office, or other relevant senior decision-makers. Our intention is constructive. A meeting would allow us to present the scientific evidence in detail, understand FIM's environmental frameworks, and explore pathways that support both motorsport and ecological stewardship. Given the distance between Adelaide and Switzerland, we would welcome a videoconference at a time convenient to you.

Thank you for your attention to this important matter. We look forward to your response.

Sincerely,



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FIM Environmental Commission
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FEDERATION INTERNATIONALE DE MOTOCYCLISME

South East City Residents Association Inc.
Attention: RD McEvoy
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secra.sa@gmail.com

Mies, 19 August 2026

Your correspondence related to the Adelaide MotoGP Circuit

Dear Prof. McEvoy,

We hereby acknowledge receipt of your letter dated 30 July 2026, co-signed by members of the South East City Residents Association and associated ecological and conservation organizations, regarding the proposed Adelaide MotoGP street circuit.

As the global governing body for motorcycle sport, the *Fédération Internationale de Motocyclisme* (FIM) is responsible for enacting and enforcing the sporting and technical regulations that ensure the safety, fairness, and integrity of motorcycle competitions worldwide.

The FIM is deeply committed to environmental protection and sustainability. We take pride in being the first international sports federation to have established an Environmental Code more than 30 years ago, a framework that continues to guide our operations and the sanctioning of events globally.

Regarding the implementation of any racing circuit for FIM World Championships events under the jurisdiction of the FIM, the FIM strictly complies with all applicable regulations in force established by local and national governments. The relevant Australian authorities bear the sole responsibility for conducting statutory reviews and issuing the necessary permits and authorizations for infrastructure development and event operations.

Please be assured that your detailed environmental and biodiversity concerns have been forwarded to the event promoter. The promoter remains in direct contact with the responsible Australian authorities to ensure all local legal frameworks and procedural requirements are fully respected.

Thank you for sharing your perspective and bringing these local community matters to our attention.

Yours sincerely,

Jorge VIEGAS
President

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Mr. Jorge Viegas,
President
FIM – Fédération Internationale de Motocyclisme 11,
Route de Suisse
1295 Mies
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September 2, 2026

We request that FIM give practical effect to its Environmental Code by requiring Liberty Media and the South Australian Motor Sport Board to:

- ***conduct an independent, comprehensive and publicly available Environmental Impact Assessment of the Adelaide MotoGP proposal, and***
- ***demonstrate compliance with the FIM Environmental Code, Sport for Nature Framework and MotoGP's ISO 20121 management system,***

before any irreversible works begin.

Dear Mr Viegas,

Thank you for your letter of 19 August 2026. We appreciate your response and your reaffirmation of FIM's commitment to environmental protection and sustainability. We also appreciate that you have forwarded our concerns to the event promoters.

On Sunday August 30, 2026, the Premier of South Australia, Mr Peter Malinauskas, revealed revised plans for the Adelaide Moto GP circuit. Plans that presumably have been agreed to by FIM and the race promoters - Liberty Media and MotoGP Sports Entertainment Group, S.L.

Unfortunately, the newly released plans reveal that the environmental impacts are substantially greater than we understood when we first wrote to you on July 30, 2026, and again on August 22, 2026.

Of the 52 acres of MotoGP infrastructure (track, run-off, pits), 77% (40 acres) will be laid within the Park Lands. Three hundred and seventy-seven trees rather than the Government's original estimate of 45, will be felled, many of them 120-150 years old. Another 88 mature trees will be relocated - not all of which will survive - and a further 22 trees are being considered for removal. The infrastructure footprint will cover 27% of an endangered nationally listed remnant native grassland.

This is ecological destruction on a grand scale and clearly is contrary to the promise made by FIM, on behalf of its affiliated members, promoters and organisers (FIM Environmental Code 2026) that it would be "committed to protecting and avoiding damage to natural habitats and species, including respecting protected areas".

An important issue, we believe, lies at the heart of this matter.

As the governing body of world motorcycle sport, FIM has chosen to adopt an Environmental Code because it recognises that environmental leadership sometimes requires standards beyond the minimum required by local law. We respectfully suggest that this proposal presents one of those occasions.

Your response appears to assume that the normal Australian environmental assessment process will apply to the proposed Adelaide MotoGP.

Respectfully, that assumption is incorrect.

The South Australian Government intends to proceed under unusual legislation that specifically exempts the project from the State's planning and environmental assessment processes that would normally apply to a development of this scale. As a result, the independent environmental scrutiny that FIM understandably assumes will occur has not taken place.

To date:

- no formal public consultation has been undertaken on the environmental impacts of the proposal;
- no independent Environmental Impact Assessment has been prepared; and
- the proposal has not been subjected to the level of transparent environmental scrutiny that would normally be expected for a project involving the permanent modification of a National Heritage-listed landscape.

This raises one important question.

If local governments can exempt themselves from normal environmental assessment processes, what role does the FIM Environmental Code actually play?

Surely the Environmental Code must require more than simple compliance with local legislation. Otherwise, the Environmental Code would appear to add little beyond

requiring promoters to comply with whatever legal requirements happen to exist in the host jurisdiction, even where those requirements have been deliberately reduced or bypassed.

We would therefore be grateful if you could clarify whether FIM considers compliance with local legislation alone to be sufficient to satisfy the obligations of its Environmental Code where the normal environmental assessment process has not occurred.

The answer to this question has significance well beyond Adelaide. If the FIM Environmental Code is to have practical meaning, it must continue to apply in circumstances where normal environmental safeguards have been reduced or bypassed.

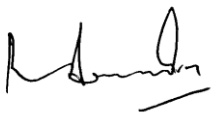
We therefore respectfully request that FIM give practical effect to its Environmental Code by requiring Liberty Media and the South Australian Motor Sport Board to:

- **conduct an independent, comprehensive and publicly available Environmental Impact Assessment, and**
- **demonstrate compliance with the FIM Environmental Code, Sport for Nature Framework and MotoGP's ISO 20121 management system,**

before any irreversible works begin.

We look forward to your response.

Sincerely,



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Mies, 3 September 2026

Dear Prof. McEvoy,

Thank you for your correspondence dated 2 September 2026.

We will need to reiterate that the FIM is responsible for the safety of the riders and for ensuring compliance with the Sporting Codes.

With regard to the FIM Environmental Code, we have already received written confirmation from both the Organiser and the Promoter of Adelaide MotoGP that they will make every effort to comply with its contents.

The FIM has neither the power, nor the expertise to conduct an Environmental Impact Assessment - nor to analyse one.

We have full confidence in the Australian Authorities with regard to all matters relating to environmental requirements and regulations.

At this stage, we would like to thank you for sharing your concerns and trust that, in the end, all parties involved will be satisfied with the outcome.

Yours sincerely,

Jorge VIEGAS
President

CC: Mr Carmelo EZPELETA, CEO MotoGP Sports Entertainment Group, S.L.
Mr Peter DOYLE, CEO Motorcycling Australia (MA)