



## Livestock SA Limited

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25-0980

24 October 2025

Mr David Greenhough  
Chair  
Hills and Fleurieu Landscape Board  
8/22 Mann Street  
MT BARKER SA 5251  
By email: [HF.landscapeboardexecutiveofficer@sa.gov.au](mailto:HF.landscapeboardexecutiveofficer@sa.gov.au)

Dear Mr Greenhough

### **Re: Draft Net Zero Agriculture Strategy for the Hills and Fleurieu**

Thank you for the opportunity to comment on the *Net Zero Agriculture Strategy and Pathway for the Hills and Fleurieu* (HF Strategy). A draft copy was forwarded to me by John Butler, Climate-ready Agriculture Coordinator on 26 September 2025 seeking comment. I understand that John has now moved to PIRSA.

Livestock SA is the peak industry body representing South Australia's sheep, beef cattle and goat producers; industries that collectively underpin a \$4.3 billion supply chain, employing more than 21,000 South Australians and driving export growth to markets that increasingly demand proof of sustainability.

We recognise the intent behind the HF Strategy to support producers in navigating the transition to a lower-emissions future. However, the approach taken raises concerns for our industry regarding policy coherence, trade implications, and the risk of unintended consequences for business viability.

#### **1. Net zero goals must be nationally consistent and industry-led**

On a state and national scale, the livestock industry is custodian of over 50 per cent of the land mass, or over 80 per cent of the agricultural land. Nationally, it accounts for over 80 per cent of agricultural emissions and inevitably comes under the spotlight whenever new reduction targets or strategies are announced.

The HF Strategy proposes a regional net zero target for agriculture by 2050, developed independently of both state and national policy frameworks and without formal industry engagement.

This is inconsistent with the Australian Government's Agriculture and Land Sector Plan, which explicitly avoids setting sector- or region-specific emission targets, and with the National Farmers'

Federation’s position that supports an *economy-wide aspiration* for net zero by 2050, *not individual targets for agriculture*.

Setting a separate regional target risk creating a patchwork of obligations that will confuse markets, undermine producer confidence, and erode the policy certainty needed for long-term investment.

The livestock industry is already leading nationally through:

- CN30<sup>1</sup> – the red meat sector’s aspirational target to achieve carbon neutrality by 2030;
- Australian Beef Sustainability Framework and Sheep Sustainability Framework, which provide transparent, internationally recognised reporting of environmental performance<sup>2</sup>; and
- South Australian Red Meat & Wool Industry Blueprint 2030, which aligns productivity, profitability, and sustainability outcomes.

These frameworks are producer-owned, science-based, and globally benchmarked. Regional landscape boards should support, not duplicate or compete with, these consumer-facing aligned pathways to sustainable production.

## **2. Trade and market access risks must be understood**

Livestock producers are already subject to sustainability and emissions reporting requirements imposed by our customers (processors and retailers) and our consumers (which comprise people in over 100 export and domestic markets). The European Union, United Kingdom, and major Asian markets are developing carbon border measures and sustainability assurance protocols that rely on credible, industry-endorsed methodologies.

Fragmented or inconsistent regional accounting systems, such as separate ‘net zero by region’ frameworks, could undermine the credibility and comparability of Australia’s national sustainability claims. This creates reputational and trade exposure for producers, processors, and exporters who rely on clear, national certification schemes.

Export customers are seeking consistency, transparency, and verification, not localised targets or voluntary inventories that could be misinterpreted as official commitments. It is critical that all regional initiatives remain aligned with national reporting and verification frameworks to protect the integrity of our red meat and wool exports<sup>3</sup>.

## **3. Revegetation and land-use implications for livestock producers**

The HF Strategy projects that to reach regional net zero, approximately 25,000 ha (9 per cent of farmed land) would need to be revegetated by 2050. This scale of land conversion is not currently realistic for commercial livestock enterprises, particularly in high-value grazing areas. Comprehensive economic analysis needs to be undertaken on the long-term impact of land use

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<sup>1</sup> Set in 2017, this bold and visionary goal served its purpose in showing our industry’s ambition. But as our understanding of livestock emissions has matured, it became clear CN30 was not achievable – even though we had already reduced emissions by 78% from 2005 levels. The technologies were not ready, and the level of government support required never materialised. More than \$100 million of industry levies have been invested in sustainability projects to date. The investment of millions more in producer levies is now being directed to where progress is credible and measurable: cutting emissions intensity per kilogram of production.

<sup>2</sup> Note: Goat Sustainability Framework currently being developed.

<sup>3</sup> About 75% of beef and sheepmeat, 95% of goatmeat, and 98% of wool is exported.

change on this scale as it risks reducing productive capacity, distorting land values, and shifting emissions overseas through reduced domestic supply.

While Livestock SA supports on-farm revegetation for biodiversity, shelter, and carbon co-benefits, sequestration must complement, not replace, agricultural production. There must also be economic analysis, regulatory clarity, and greater market integrity before producers are encouraged to participate in carbon or biodiversity schemes.

#### **4. Water, regulation, and governance concerns**

The proposal to alter water allocation plans to facilitate sequestration projects in prescribed catchments lacks sufficient consultation and impact analysis. In regions such as the Mount Lofty Ranges, where water demand already exceeds availability, this could displace agricultural water use and create inequities between landholders. More broadly, the HF Strategy appears to assume that regional landscape boards can act as policy makers and regulators of emissions, rather than as facilitators of voluntary adoption.

Emissions management should remain a nationally consistent, industry-led process, supported by research, extension, and incentive mechanisms. Many producers already find this area of their business confusing, with no single source of truth and a lack of coordination, so additional strategies and regulatory layers will likely only add to this uncertainty.

#### **5. A constructive pathway forward**

Livestock SA supports practical, industry-led initiatives that:

- build producer capability in farm-level emissions accounting and carbon literacy;
- expand access to emission-reducing technologies such as methane-inhibiting feed additives, genetics, and animal health improvements;
- encourage co-investment in soil and vegetation carbon projects where they are economically viable; and
- align with the Agriculture and Land Sector Plan, Carbon Farming Roadmap for South Australia, and existing industry sustainability frameworks.

South Australia's livestock industries are committed to a lower-emissions future. However, that transition must be grounded in economic reality, trade integrity, and national alignment. Regional strategies must focus on empowering producers with tools, data, and investment opportunities, not imply or enforce new compliance expectations or create further policy fragmentation.

Livestock SA looks forward to continued collaboration with the Landscape Board to ensure that sustainability initiatives enhance the resilience and competitiveness of the state's livestock industry.

Yours sincerely

Travis Tobin  
Chief Executive Officer

cc: Mr Ben Bruce, Chief Executive – Department for Environment and Water  
Professor Mehdi Doroudi, Chief Executive – PIRSA  
Professor Simon Maddocks, Chair – Primary Producers SA