



## Livestock SA Limited

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## SUBMISSION

7 November 2025

Ms Rebecca Boehm  
Manager, Ministerial and Cabinet Coordination  
Department of Primary Industries and Regions SA  
Via email: [Rebecca.boehm@sa.gov.au](mailto:Rebecca.boehm@sa.gov.au)

Dear Rebecca

### Re: Department of Primary Industries and Regions Biosecurity Strategy 2025-2030

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. Representing over 5,200 sheep producers, 2,700 beef cattle producers and several hundred goat producers across the state, we work to secure a strong and sustainable livestock industry. Supporting over 21,000 jobs, South Australia's \$4.3 billion livestock industry is a key economic contributor to the state and the nation.

We appreciate the opportunity to provide feedback on the Department of Primary Industries and Regions (PIRSA) Biosecurity Strategy 2025–2030 (Strategy).

### Introduction

South Australia's biosecurity is fundamental to the success of our livestock industries, as well as the health of our environment, economy and regional communities. A well-resourced, coordinated and effective biosecurity system is essential to maintaining productivity and supporting the state's contribution to national agricultural growth targets.

In South Australia, livestock production occurs on over 50 per cent of the state's landmass and occupies over 80 per cent of our agricultural land. Our members recognise the need to imbed strong on farm biosecurity practices, and to support research, development and extension to bolster the state's ability to respond to pest and disease incursions.

Enhancing biosecurity culture is a priority for our industry and targets that enable measured improvement are included our strategic plan – the SA Red Meat & Wool Blueprint 2030 (Blueprint)<sup>1</sup>. We hold several key concerns regarding the Strategy and the practical delivery of its four strategic pillars.

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<sup>1</sup> <https://livestocksa.com.au/assets/lisa/documents/Blueprint-v.15-FINAL.pdf>

## Strategic Pillar 1 – Collective Responsibility

Livestock SA recognises that shared responsibility is critical to long-term biosecurity success. This responsibility must be applied fairly across all participants, risk creators and beneficiaries within the system. South Australian livestock producers already demonstrate a strong commitment, investing heavily in biosecurity through on-farm practices, contributions to the Sheep and Cattle Industry Funds, statutory federal levies including funding for Animal Health Australia, and general taxation. Implementation of the new Strategy must therefore ensure equity across all groups that benefit from a robust biosecurity framework.

Livestock SA supports strengthening collective responsibility and improving awareness of individual biosecurity duties. As part of the Blueprint, the value chain has a target to ensure 100 per cent of industry stakeholders understand their role in an Emergency Animal Disease (EAD) outbreak. With EAD threats increasing, it becomes imperative that it is not only industry stakeholders that understand their obligations, but the wider public as well. The experience of other jurisdictions shows limited success in educating the public, many of whom still perceive biosecurity as solely an agricultural issue. Genuine shared accountability will require sustained education and practical, enforceable compliance measures across all sectors, not just agriculture.

A clear, practical and enforceable framework for determining, assessing and meeting individual obligations under this pillar is essential. This includes setting realistic expectations around what constitutes ‘reasonable awareness’ and what is ‘reasonably practicable’ in reducing, mitigating or eliminating risk. Robust consultation with industry will be critical, and engagement must extend meaningfully beyond agricultural stakeholders to ensure non-agricultural sectors also understand and discharge their obligations.

To further support the objectives of this pillar, it will be important for PIRSA to draw on lessons from other jurisdictions. For example, the 2023 Statutory Review of the Biosecurity Act 2015 (NSW) identified the need for structured education programs, better access to information and clear, enforceable expectations across all stakeholder groups in relation to one’s general biosecurity duty.<sup>2</sup> Similar themes emerged in the 2019 review of the Biosecurity Act 2014 (Qld), which identified the need to strengthen understanding of the General Biosecurity Obligation, improve the use and effectiveness of individual biosecurity plans, and update training for authorised officers.<sup>3</sup>

South Australia can build upon these findings by establishing practical, risk-based communication and training program that:

- Supports producers and landholders to meet their responsibilities under the Strategy;
- Ensures the wider community understands its role and obligations;
- Enhances preparedness for emergency responses; and
- Builds confidence in government and industry capability to manage biosecurity risks.

A coordinated, well-resourced communication and training effort will be essential. Livestock SA welcomes this direction and encourages PIRSA to ensure the Strategy is supported by measurable actions, clear accountability and appropriate investment to deliver genuine, state-wide participation in biosecurity.

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<sup>2</sup> Statutory Review of the Biosecurity Act 2015, Department of Regional NSW, June 2023, Accessed at [https://www.parliament.nsw.gov.au/tp/files/84670/INT21%20171229%20%20Final%20report%20-%20Statutory%20Review%20of%20the%20Biosecurity%20Act%202015\(2\).pdf](https://www.parliament.nsw.gov.au/tp/files/84670/INT21%20171229%20%20Final%20report%20-%20Statutory%20Review%20of%20the%20Biosecurity%20Act%202015(2).pdf)

<sup>3</sup> Review of the Queensland Biosecurity Act 2014, Department of Agriculture and Fisheries Qld, June 2019, Accessed at [https://www.publications.qld.gov.au/ckan-publications-attachments-prod/resources/ea852bad-5f34-42bd-832b-ea82c1a5e602/report\\_on\\_the\\_review\\_of\\_the\\_biosecurity\\_act\\_2014.pdf?ETag=8ee2fd4bf868ba86c71c84470b280e00](https://www.publications.qld.gov.au/ckan-publications-attachments-prod/resources/ea852bad-5f34-42bd-832b-ea82c1a5e602/report_on_the_review_of_the_biosecurity_act_2014.pdf?ETag=8ee2fd4bf868ba86c71c84470b280e00)

**Recommendation 1:** Make the General Biosecurity Duty operational, not rhetorical, such as:

- Establish clear and practical training programs which support collective responsibility for biosecurity for the wider community in South Australia.

**Recommendation 2:** Incorporate learnings from other jurisdictions to inform communication, planning and training approaches, such as:

- Define 'reasonably practicable' in the regulations with sector-specific examples and publish SA 'How to meet your duty' guides, supported by property-entry signage and biosecurity plan templates that trigger obligations for all entrants.

**Recommendation 3:** Conduct a statewide public awareness campaign (not just industry-facing) with measurable reach and recall.

## **Strategic Pillar 2 – Building Biosecurity Capability and Capacity through Innovation and Partnerships**

Improving collaboration between all stakeholders delivers clear benefits and supports a more resilient and biosecure state. Livestock SA recognises the need to enhance biosecurity capability and capacity across the biosecurity system, however, emphasises that poorly designed arrangements that fail to recognise the extensive work already in operation risks undermining existing systems and diminishing biosecurity effectiveness. Any new structures must build on, not duplicate or disrupt, the frameworks that are already functioning well.

Genuine alignment with industry is essential, particularly around established biosecurity strategic plans. The Blueprint was developed through a collaborative process with a shared commitment to safeguarding animal health, market access and industry sustainability. Ensuring this Strategy is respected and integrated into future planning will support consistency, efficiency and strong collective outcomes.

More detail about proposed MOUs and/or formal agreements to define stakeholder roles and responsibilities is needed. Areas such as scope, practical application, decision-making parameters and interaction with existing frameworks must be clarified sooner rather than later. Any agreement must recognise and align with current obligations rather than override or complicate them. For the livestock sector in particular, the Emergency Animal Disease Response Agreement (EADRA) and its suite of supporting documents already establish clear responsibilities and decision-making structures.

**Recommendation 4:** Review existing biosecurity arrangements for South Australia and ensure any new partnership frameworks are designed to complement, not replace, weaken or contradict any arrangements currently in place.

**Recommendation 5:** Adopt time-boxed, geographically targeted biosecurity programs – with published objectives, methods, privacy safeguards and outcomes reporting – to lift early detection and create predictable compliance for producers.

### Strategic Pillar 3 – Rigorous Biosecurity Systems

Under the Blueprint, maintaining and improving market access remains a critical priority for South Australia’s livestock sector. Central to this is strong, coordinated preparedness, response and recovery capability for EAD incursions. Rigorous biosecurity systems are essential to protect industry competitiveness and confidence, and it is encouraging that the Strategy recognises the need for fully operational biosecurity legislation.

Alignment with national traceability, certification and EADRA processes are critical to ensure export confidence and rapid response interoperability. This also ensures that local implementation is tied to national market outcomes and gives PIRSA a clear performance anchor.

In strengthening biosecurity through legislation, regulation and policy, Livestock SA does not support industry representative bodies being assigned co-regulatory responsibilities. As the peak organisation representing South Australia’s sheep, cattle and goat producers, Livestock SA’s role is to support producers through advocacy, extension, education and development, not to undertake regulatory functions. The organisation has consistently advocated for increased departmental capacity and resourcing to ensure effective compliance and enforcement where required.<sup>4</sup> This separation of responsibilities maintains clarity and ensures producers receive appropriate support to meet biosecurity obligations where required.

**Recommendation 6:** Undertake a comprehensive review of departmental capacity and resourcing to ensure it is adequately equipped to deliver effective and timely biosecurity compliance and enforcement in South Australia. The review should tie the assessed performance expectation to any capability uplift needs.

**Recommendation 7:** Commit to nationally interoperable traceability, certification and sampling protocols to maintain trade during responses that are backed by PIRSA-funded testing where eradication isn’t feasible.

### Strategic Pillar 4 – Strategic Investment

Livestock SA welcomes the intent under Strategic Pillar 4 to secure sustainable and risk-aligned investment to support South Australia’s biosecurity system. However, greater clarity on future funding arrangements is needed, including the mechanisms for cost-sharing, the balance between government and industry contributions, and how priorities will be determined. While the Strategy highlights co-investment and shared responsibility, it does not clearly outline how funding decisions will be administered or evaluated, nor the governance structures that will sit behind those decisions.

Primary producers already make significant financial contributions to state and national biosecurity systems through levies, traceability systems, industry-funded initiatives and ongoing on-farm investment in prevention and preparedness. It is critical that any future funding model recognises these existing commitments and avoids duplicating costs or shifting undue financial burden onto producers. Government must continue to provide a strong baseline of public funding for biosecurity, reflecting its role as a public good. Where industry partnership is sought, this should be clearly defined, equitable, and linked to measurable improvements in system readiness, rapid response capacity and long-term resilience.

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<sup>4</sup> Livestock SA submission to PIRSA for *Developing a New Biosecurity Act for South Australia*, February 2023, <https://livestocksa.com.au/developing-a-new-biosecurity-act-for-south-australia>

Investment alignment with the Blueprint is essential, particularly in relation to strengthening EAD preparedness, safeguarding domestic and export market access, and building workforce capability across livestock supply chains. Continued investment alignment between the Strategy and the Blueprint will ensure effort is not fragmented across programs, will maintain industry confidence and will reinforce South Australia’s competitive advantage through a well-coordinated and future-ready biosecurity system.

Livestock SA encourages frank, ongoing engagement with industry throughout the implementation of this Strategy to ensure funding arrangements are fair, transparent and reflect shared goals. Clear guidance on investment governance, cost-sharing expectations and outcome measurement will support confidence in the system and ensure resources are directed to highest-value biosecurity priorities, consistent with both the Strategy and the Blueprint’s long-term vision for a resilient livestock sector.

**Recommendation 8:** Clearly define proposed biosecurity co-investment arrangements, ensuring a fair balance between public and industry contributions, recognition of existing producer investment, alignment with the SA Red Meat & Wool Blueprint 2030, and transparent governance and accountability for how resources are prioritised and delivered.

**Recommendation 9:** Adopt the following funding principles:

- baseline public funding for public good
- risk-creator/beneficiary co-funding for incremental measures
- no duplication with Sheep or Cattle Industry Funds
- mandatory cost-recovery impact assessment before any new levy or charge
- sunset clauses and performance KPIs for all co-investment
- audited annual reporting of biosecurity revenues and outlays by risk stream.

### **Implementing the Strategy**

Clear governance and strong stakeholder confidence depend on a Steering Committee that is genuinely representative and supported by transparent reporting. A more detailed outline of the Committee’s composition is needed to ensure it includes a strong mix of industry, government, stakeholders and technical expertise.

Transparent and timely reporting mechanisms should be established as part of the Annual Plans to keep stakeholders informed of progress, outcomes and emerging issues. Regular reporting will strengthen accountability, maintain trust, and ensure stakeholders can see how their perspectives are being incorporated and respected within the delivery of the Strategy.

**Recommendation 10:** Further define the Steering Committee composition and implement mechanisms as part of the Annual Plans that support transparency and accountability over the lifetime of the Strategy.

### **Conclusion**

South Australia has an opportunity to move beyond compliance rhetoric and embed a truly modern, outcome-driven biosecurity system. The Strategy’s success will hinge on how clearly responsibilities are defined, how effectively capability is built across government and industry, and how sustainably the system is funded.

By translating the General Biosecurity Duty into practical guidance; adopting Biosecurity Programs that enable consistent, lawful and transparent surveillance, prevention and control activities; aligning with national standards; and locking in fair and transparent funding principles, South Australia can establish a best-practice model of shared accountability.

Livestock SA looks forward to continuing to work with Government to ensure that implementation of the Strategy strengthens producer confidence, protects market access, and maintains South Australia's reputation as a leader in animal health and biosecurity management.

Please contact the Livestock SA office on (08) 8297 2299 or via email at [admin@livestocksa.com.au](mailto:admin@livestocksa.com.au) if you would like to discuss this submission further.

Yours sincerely

Travis Tobin  
Chief Executive Officer