



Livestock SA Limited

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SUBMISSION

24 November 2025

Rose-Marie Bredl
Fauna Permits Unit Coordinator
Department for Environment and Water
81-95 Waymouth Street
ADELAIDE SA 5000

Via email: DEWFaunaPermitsUnit@sa.gov.au

Dear Rose-Marie

Re: Reviewing the policy for wildlife rescue and release in South Australia

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. South Australia's \$4.3 billion livestock industry is a key economic contributor to the state and supports 21,000 South Australian jobs across the red meat and wool supply chains.

Our industry operates on 84 per cent of the state's agricultural land, covering more than half of South Australia's landmass. Decisions affecting wildlife management directly affect livestock producers, the landscapes they manage, and the economic resilience of regional communities.

Livestock SA welcomes the opportunity to provide feedback on the review of South Australia's wildlife rescue and release policy.

Introduction

Landholders play a critical role in supporting native wildlife across agricultural regions and routinely absorb the impact of increasing populations of kangaroos, wombats and possums. Livestock SA recognises improvements in wildlife rehabilitation practices and the welfare case for enabling release where appropriate. However, any change to South Australia's currently restrictive policy must be grounded in robust safeguards that prevent unintended impacts on agricultural businesses and regional landscapes.

The department's material notes that South Australia is currently an outlier by prohibiting release of rehabilitated macropods, male brushtail possums (after 24 hours), and wombats. While alignment with other jurisdictions is reasonable in principle, interstate models only function because they include strict ecological, disease-risk and landholder-consent controls. Replicating only the

‘permission to release’ while omitting the safeguards would create a material increase in risk for South Australian producers.

Release Areas

Livestock SA strongly supports the retention of mandatory written consent for releases on private land. Consent must remain non-negotiable and supported by a transparent approval process.

Interstate experience demonstrates why this is essential:

- In New South Wales, the Rehabilitation of Protected Native Animals Policy mandates landholder consent and requires releases to meet strict criteria for site suitability and population impacts.
- In Victoria, the Wildlife Rehabilitation Guidelines require explicit approval from land managers and prohibit releases where local populations are already high or causing conflict.

To ensure alignment with this national standard, SA’s policy must:

- prohibit any release within or adjacent to high-value cropping, grazing or horticultural zones without explicit written landholder consent;
- introduce a mechanism to prevent repeated releases onto the same property without cumulative-impact assessment; and
- ensure release sites are sufficiently distanced from productive farmland and infrastructure to avoid spillover onto neighbouring properties that have not given consent.

Grazing Pressure and Feed Competition

Kangaroo populations in South Australia now exceed five million, having grown significantly following several favourable seasons prior to the current drought. In many pastoral and mixed-farming regions, macropods are already at or above ecological and agricultural carrying capacity.

A single 50 kg kangaroo is equivalent to approximately 1 dry sheep equivalent (DSE). At scale, the impact on pasture reserves, water points and remnant vegetation is substantial¹.

The South Australian Government has recently acknowledged this through the *Reducing Grazing Pressure through Kangaroo Management Program*, funded under the \$73 million Drought Response Package. Policy settings that enable an increase in wildlife density in agricultural landscapes run counter to current government investment and risk undermining these programs.

Livestock SA therefore recommends that any release policy include mandatory local population-density assessment, including seasonal conditions, feed availability and proximity to water.

Infrastructure, Safety and Land Condition Impacts

Producer experience and national evidence demonstrate that unmanaged increases in macropod and wombat numbers cause:

- damage to fencing, leading to stock movement and biosecurity breaches;
- wombat burrow undermining of tracks, dam walls and fencelines;
- vehicle-strike risks for farm machinery and road users; and
- land degradation due to concentrated grazing and trampling pressure.

¹ Pahl, L. (2020). Macropods, feral goats, sheep and cattle. 1. Equivalency in how much they eat. *The Rangeland Journal* 41, 497-518. Accessed here: <https://era.dpi.qld.gov.au/id/eprint/7470/1/RJ19044.pdf>

Other jurisdictions have explicitly acknowledged these risks. For example, Victoria's *Kangaroo Harvesting Program* cites reducing infrastructure damage and improving road safety as key management objectives. Without similar risk control, releases in South Australia risk shifting costs and liabilities onto landholders, landscape boards and regional councils.

Biosecurity

Any wildlife-release framework must be underpinned by strong biosecurity discipline. While rehabilitated animals may be clinically healthy at release, risks remain at the livestock-wildlife interface.

National and jurisdictional guidance recognises the following:

- Q fever (*Coxiella burnetii*) has been well documented in macropods and associated environments.
- Sarcoptic mange, carried by wombats and other wildlife, is a significant zoonotic and multi-species health risk with ongoing environmental and production impacts.
- New Zealand's experience with *Mycobacterium bovis*² in brushtail possums demonstrates how wildlife can become reservoirs of livestock-impacting disease in the absence of strong boundaries and surveillance.

To protect South Australia's livestock biosecurity system and avoid undermining industry/government partnerships and co-investment in the new Biosecurity Act, Livestock SA recommends that the revised policy include:

- mandatory veterinary certification that animals are free from key diseases and parasites of relevance to livestock;
- exclusion of release into areas with known wildlife-livestock disease interface concerns;
- alignment of the release-approval process with regional biosecurity plans and property-level risk management;
- clear reporting obligations for carers, release coordinators and landholders.

These requirements reflect standard practice in NSW, Victoria and Queensland and are essential if South Australia is to align with other jurisdictions.

Summary

Livestock SA supports improvements to wildlife welfare outcomes where risks can be managed effectively. Any revised South Australian policy must be built around controls already operating in other states, including:

1. Robust release-site criteria, incorporating local population density, seasonal conditions, ecological carrying capacity and distance from productive agricultural areas.
2. Mandatory written landholder consent for any private-land release, including assessment of cumulative impacts.
3. Strong biosecurity safeguards, including veterinary clearance, disease-risk assessment and alignment with regional biosecurity plans.

² *Mycobacterium bovis* is the bacteria that causes bovine tuberculosis (TB). In 1970, Australia began the bovine Brucellosis and Tuberculosis Eradication Campaign (BTEC) which involved testing and culling of infected animals, traceback/forward of farms, and abattoir surveillance. Australia was declared free of bovine TB on 31 December 1997 – 27 years after the eradication program commenced.

4. Clear communication pathways with landholders, local councils and regional communities before any release is authorised.
5. Integration with existing government investment, ensuring release decisions do not undermine other government funded kangaroo-management programs, such as the current drought response measures.
6. Monitoring and reporting requirements to evaluate ecological and agricultural impacts over time.

While the numbers the department proposes might be small on paper, the policy direction pushes risk back onto landholders and cuts across broader efforts to manage overabundant native herbivores in agricultural landscapes. For producers who already feel they are carrying the cost of overabundance, sanctioned releases risk exacerbating grazing pressure and undermining commercial stocking and feed budgeting.

Livestock SA welcomes continued engagement with the department on the development of release criteria and on any future processes to ensure wildlife releases occur safely, responsibly and without adverse impacts on agriculture or regional communities.

Please contact us on (08) 8297 2299 or via email at admin@livestocksa.com.au to discuss this submission further.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Travis Tobin', written in a cursive style.

Travis Tobin
Chief Executive Officer