



## Livestock SA Limited

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## SUBMISSION

6 March 2026

Michael Garrod  
General Manager  
Hills and Fleurieu Landscape Board  
8/22 Mann Street  
Mount Barker SA 5251  
Via email: [hf.landscapeboard@sa.gov.au](mailto:hf.landscapeboard@sa.gov.au)

Dear Michael

### **Re: Submission to Draft Hills and Fleurieu Landscape Plan 2026–31 and Net Zero Strategy for Agriculture**

Livestock SA is the peak industry body representing South Australia’s sheep, beef cattle and goat producers. Our members underpin a \$4.3 billion livestock industry that supports more than 21,000 South Australian jobs across the red meat and wool supply chains.

We welcome the opportunity to provide comment on the Draft Hills and Fleurieu Landscape Plan 2026–31 (Plan). We support the submission made by Primary Producers SA (PPSA) and reiterate the concerns raised in our 24 October 2025 submission regarding the previous draft Net Zero Agriculture Strategy.

### **1. Policy Coherence and Governance**

The Plan is a plan ‘for the whole region’ rather than solely for the Hills and Fleurieu Landscape Board. Following the meeting on 2 March 2026, it is our understanding that this approach is not consistently adopted by all landscape boards across the state and it does not align with the process for the new State Landscape Strategy currently in development.

Regional planning must complement, not extend beyond, state and Commonwealth policy settings. Where ‘industry’ is listed as a delivery partner, this should not imply endorsement of actions that have not been formally co-designed with the relevant representative organisations.

### **2. Climate: National Alignment and Practical Pathways**

#### **2.1 Opposition to Regional Net Zero Targets for Agriculture**

Under Priority C1, the Plan continues to embed a regional net zero framing for agriculture in the region.

This remains inconsistent with:

- The Australian Government’s Agriculture and Land Sector Plan (2023), which explicitly does not impose sector-specific targets;
- The National Farmers’ Federation’s policy position supporting an economy-wide aspiration for net zero by 2050, not sector or regional targets;
- The SA Red Meat and Wool Blueprint 2030 where the goal under the ‘Our Environment’ pillar is *to enhance the natural environment and biodiversity of the land we farm, and to maximise our sector’s contribution to climate change mitigation and resilience via a science-based, collaborative, whole of value-chain approach.*

Regional agricultural net zero targets risk:

- Policy fragmentation;
- Duplicative reporting;
- Market confusion;
- Reduced investment confidence.

Climate policy affecting livestock must remain nationally consistent and industry-led. Livestock SA reiterates its opposition to regional- or sector-specific net zero targets. Such approaches risk creating unnecessary complexity, regulatory burden and commercial uncertainty for producers and agricultural industries more broadly.

## **2.2 Emissions Intensity — The Evidence-Based Pathway**

Through Meat & Livestock Australia (MLA), the red meat industry initially set the Carbon Neutral by 2030 (CN30) ambition. As scientific understanding and technology readiness evolved, the industry has shifted its focus toward reducing emissions intensity – emissions per kilogram of production.

This approach reflects evidence from MLA, CSIRO and international bodies such as the FAO, demonstrating that improvements in productivity, genetics, animal health and feed efficiency reduce emissions intensity while maintaining food production.

Reducing emissions intensity maintains production, protects food security, avoids carbon leakage and improves industry and global competitiveness.

Absolute regional emissions caps, by contrast, risk reducing domestic output and shifting emissions offshore to less efficient systems. The Plan should explicitly prioritise productivity-led emissions intensity reduction, consistent with national and industry positions.

## **3. Trade and Market Integrity**

Approximately 75% of beef and sheepmeat; 95% of goatmeat; and 98% of wool are exported. Export markets increasingly rely on national greenhouse accounting methodologies and nationally consistent sustainability reporting.

Emerging carbon border mechanisms and sustainability requirements in the EU, UK and Asia rely on credible national systems.

A region-specific “net zero agriculture” narrative risks:

- Undermining comparability of national reporting;
- Increasing compliance burdens;
- Creating reputational exposure if interpreted as binding commitments.

Trade integrity depends on national coordination, not regional divergence.

#### **4. Land Use Change and Revegetation**

Earlier modelling associated with the HF Net Zero Strategy suggested approximately 25,000 hectares (around 9% of farmland) would need to be revegetated to offset residual emissions. Large-scale land conversion raises concerns around:

- Reduced productive capacity;
- Land price distortion through carbon speculation;
- Permanence obligations (25–100 years);
- Water interception impacts;
- Emissions leakage offshore.

The Climate Change Authority, ABARES and FAO all emphasise the importance of balancing sequestration with food production.

Livestock SA supports voluntary participation in carbon markets and complementary revegetation integrated into production. We do not support policies that implicitly favour permanent land conversion away from food production.

#### **5. Water Security and Investment Confidence**

Water security is foundational to livestock viability. ABARES and the Productivity Commission consistently identify predictable water allocation frameworks as essential to agricultural investment.

Livestock SA supports:

- Secure stock and domestic access;
- Investment in on-farm storage;
- Technology-driven efficiency;
- Transparent and science-based allocation frameworks.

We oppose:

- Additional regulatory overlays without clear evidence;
- Measures that undermine water certainty in prescribed catchments;
- Climate-related duplication of existing planning frameworks.

Resilience is built through investment and efficiency, not regulatory layering.

#### **6. National Food Security Strategy – “Feeding Australia”**

The Australian Government is currently developing a National Food Security Strategy (Feeding Australia) through the Department of Agriculture, Fisheries and Forestry (DAFF). The strategy is intended to strengthen the productivity, resilience and security of Australia’s food system and is being guided by a National Food Council.

Key themes emerging from the consultation process include:

- Food system resilience;
- Productivity and efficiency;
- Supply chain stability;
- Climate adaptation within a food security framework;

- Maintaining export competitiveness.

This national strategy recognises that Australia produces food for more than twice its population and the nation's critical role in global food markets.

Regional landscape planning must align with this emerging national food strategy, and climate and biodiversity outcomes must be integrated with, not separated from, food production objectives.

Policies that reduce productive capacity; introduce regulatory uncertainty; fragment national climate policy; and distort land and water markets are inconsistent with the objectives of strengthening Australia's food system resilience.

## **7. Core Business Priorities**

Livestock SA strongly supports prioritising:

- Pest animal control (cross-tenure coordination);
- Weed management;
- Soil health and erosion mitigation;
- Drought and bushfire preparedness;
- Practical on-farm resilience initiatives.

These deliver measurable environmental and productivity gains and represent the Board's comparative advantage. Expansion into broader climate target-setting must not dilute these core functions.

## **8. A Practical Way Forward**

Livestock SA supports a practical, collaborative approach that strengthens environmental outcomes while maintaining food production and regional economic resilience. We recommend the Plan:

1. Remove or soften implied regional net zero agriculture targets.
2. Explicitly align with the Agriculture and Land Sector Plan; the emerging National Food Security Strategy; and industry sustainability frameworks that have been developed in response to market drivers.
3. Prioritise emissions intensity reduction over absolute emissions caps.
4. Ensure carbon and biodiversity participation remains voluntary and commercially viable.
5. Avoid duplicative regulatory triggers in planning and water policy.
6. Focus investment on productivity-led resilience and core landscape functions.

## **9. Conclusion**

South Australia's livestock producers are committed to improving environmental outcomes and contributing to national climate goals. However, policy must be:

- Nationally consistent;
- Trade-aligned;
- Evidence-based;

- Economically viable;
- Supportive of food security;
- Industry-led.

The evidence from MLA, CSIRO, ABARES and the FAO is clear: productivity-led emissions intensity reduction is the most practical and globally responsible pathway for livestock systems.

The Regional Landscape Plan should reinforce, not fragment, that pathway.

Livestock SA remains committed to working constructively with the Hills and Fleurieu Landscape Board, PPSA and government to ensure the Plan strengthens the resilience, competitiveness and sustainability of livestock producers in the region.

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