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SUBMISSION

29 May 2026

Environment Law Reform Taskforce
Department of Climate Change, Energy, the Environment and Water
By email: EPRconsultation@dcceew.gov.au

To Whom It May Concern,

Re: Submission to National Environmental Standard for Matters of National Environmental Significance

Livestock SA welcomes the opportunity to provide a submission on the proposed National Environmental Standard for Matters of National Environmental Significance (MNES Standard).

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 members manage some of Australia's most environmentally diverse production landscapes, from the high rainfall regions of the South East and Fleurieu Peninsula to the pastoral rangelands that cover approximately 40 million hectares of South Australia.

Livestock production is undertaken across approximately 84 per cent of South Australia's agricultural land and contributes significantly to regional employment, food production, export earnings and the ongoing stewardship of natural resources.

Livestock SA supports the submissions made by the National Farmers' Federation (NFF) and Primary Producers SA (PPSA) and endorses the concerns and recommendations raised throughout those submissions. We request that this submission be read in conjunction with both documents.

While Livestock SA supports the objective of improving environmental outcomes and recognises the importance of Matters of National Environmental Significance, we do not support the MNES Standard in its current form.

The proposed Standard does not provide a clear, practical or workable pathway for livestock producers to understand their obligations, assess compliance risks or determine whether routine farming activities may require referral under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

For producers managing large and environmentally diverse landscapes, the absence of practical guidance creates significant uncertainty and risks unintended consequences for agricultural productivity, drought resilience, animal welfare and regional investment.

Food Security and Productive Landscapes

Livestock SA is concerned that the proposed Standard inadequately considers the role of agricultural production in supporting Australia's food security, regional economies and sovereign capability.

Environmental protection and food production should not be viewed as competing objectives. South Australian livestock producers have a long history of improving environmental outcomes while continuing to produce safe, high-quality food and fibre for domestic and international markets.

The Commonwealth is currently developing a National Food Security Strategy to strengthen Australia's long-term food resilience. It is therefore critical that environmental reforms are implemented in a manner that supports both biodiversity outcomes and the ongoing productive use of agricultural land.

The MNES Standard should explicitly recognise the importance of maintaining Australia's capacity to produce food and fibre and avoid creating regulatory settings that unnecessarily constrain productive agricultural activity or investment.

The Reality of Extensive Grazing Systems

Much of South Australia's livestock production occurs in extensive grazing systems where producers manage very large landholdings across highly variable landscapes. The practical reality for these businesses differs substantially from more intensive land uses.

Livestock producers routinely undertake activities including grazing management, fencing, stock water infrastructure maintenance, pest, predator and overabundant native species control, weed management, pasture management and drought response measures. These activities are often undertaken across thousands, and in some cases hundreds of thousands, of hectares.

The current framework provides little certainty regarding how these activities will be assessed under the proposed Standard.

It is neither practical nor reasonable to expect producers to undertake repeated ecological assessments to determine whether routine operational decisions may interact with potential habitat mapping or trigger referral requirements.

The Standard must recognise the practical realities of broadacre and pastoral livestock production systems and provide clear pathways for producers to confidently understand and meet their obligations.

Drought Resilience, Animal Welfare and Climate Adaptation

South Australian livestock producers are continuing to manage the impacts of severe drought conditions across many regions of the state. The ability of producers to respond to drought and protect animal welfare depends on timely investment in critical infrastructure and management activities including:

- stock water infrastructure;

- pipelines and tanks;
- fencing;
- emergency feeding facilities;
- predator management infrastructure;
- water storage and supply systems; and
- landscape management activities that improve resilience to future climatic events.

Livestock SA is concerned that the cumulative effect of increasing environmental regulation may inadvertently create barriers to these essential activities.

The Commonwealth should provide explicit recognition that activities undertaken to improve drought preparedness, climate adaptation, biosecurity preparedness and animal welfare outcomes are legitimate agricultural activities and should not be unnecessarily constrained by regulatory uncertainty.

Continuing Use and Routine Agricultural Activities

One of the most significant concerns raised by our members relates to the treatment of continuing use activities and routine agricultural operations. Livestock SA supports the development of a practical agricultural activities schedule that clearly identifies routine farming activities that do not require referral under the EPBC framework. This schedule should include activities such as:

- livestock grazing and grazing management;
- replacement and maintenance of fencing;
- maintenance of stock water infrastructure;
- weed and pest animal control;
- predator management activities;
- routine pasture management;
- animal welfare activities;
- drought response measures; and
- maintenance of existing infrastructure.

Providing certainty around these activities would significantly improve compliance outcomes while reducing unnecessary costs and administrative burden.

Data Quality, Mapping and Regulatory Confidence

Livestock SA shares the concerns raised by NFF regarding the use of environmental mapping and data tools. Current mapping products and predictive habitat models are often insufficiently accurate to support definitive compliance decisions at the property level. Producers are frequently expected to bear the cost of resolving uncertainty despite relying upon information generated or endorsed by government agencies.

Improving environmental outcomes requires better information, not simply more regulation. The Commonwealth should prioritise:

- improved mapping accuracy;
- transparent confidence levels for environmental data;
- practical challenge and correction mechanisms;
- updated Significant Impact Guidelines;
- agriculture-specific guidance materials; and
- dedicated extension and communication resources.

Without these measures, uncertainty will continue to be transferred onto individual producers who are often poorly placed to resolve complex technical and legal questions.

Conclusion

Livestock SA supports the objectives of improving environmental outcomes and recognises the importance of effective environmental regulation.

However, the proposed MNES Standard does not currently provide the certainty, practicality or proportionality required for livestock producers to confidently understand and meet their obligations under the EPBC Act.

We support the concerns and recommendations raised by NFF and PPSA and urge the Commonwealth to undertake substantial further work before progressing the Standard, including:

- explicit recognition of food security and agricultural productivity outcomes;
- greater consideration of extensive grazing and pastoral production systems;
- protection of drought resilience, climate adaptation and animal welfare activities;
- clear recognition of continuing-use agricultural activities;
- development of an agricultural activities schedule;
- improved environmental data and mapping; and
- practical guidance developed in genuine partnership with industry.

Livestock SA remains committed to working constructively with government to achieve environmental outcomes that are both effective and workable for South Australian livestock producers.

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

Yours sincerely



Travis Tobin
Chief Executive Officer