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SUBMISSION

18 August 2026

Becky Houston

A/Executive Director | Major Programs & Regions

Department of Primary Industries and Regions

L21, 11 Waymouth Street

ADELAIDE SA 5000

Via email: PIRSA.ClimateChange@sa.gov.au

Dear Becky

Re: Submission to Carbon Farming Roadmap for South Australia Update

Livestock SA is the peak industry body representing South Australia's red meat and wool producers. We represent more than 5,200 sheep producers, 2,700 beef cattle producers and several hundred goat producers across the state. We advocate for policies and programs that strengthen the viability and sustainability of South Australia's livestock industry, which contributes approximately \$4.3 billion annually to the state's economy and supports more than 21,000 jobs throughout the red meat and wool supply chains.

Livestock SA welcomes the opportunity to provide feedback on the update of the Carbon Farming Roadmap for South Australia (Roadmap), first released in 2022. We understand that this process is not intended to create a new strategy, rather it will refine and strengthen the existing Roadmap by updating priorities, actions and implementation pathways to ensure they remain relevant, effective and aligned with current conditions. Only activities relating to agricultural emissions reporting or abatement, and sequestration on agricultural land will be included in the updated Roadmap. We also appreciated the opportunity to meet with you on 4 August 2026 and provide this feedback in addition to the points raised in that meeting.

Introduction

The Roadmap is an important framework for supporting landholders and primary producers to understand and participate in carbon farming where it is practical, commercially viable and aligned with productive agricultural systems.

South Australian livestock producers are already contributing to emissions reduction, carbon sequestration, biodiversity protection, soil health and landscape resilience. Future policy should recognise these contributions while ensuring carbon farming supports, rather than displaces, food and fibre production, regional communities and long-term farm business viability.

The updated Roadmap should provide clear, coordinated and practical direction for livestock producers. This includes transparent reporting on progress under the existing Roadmap, simplified guidance across state and Commonwealth policies, fair incentives for voluntary participation, practical ACCU Scheme methods, trusted data and benchmarks, appropriate recognition of enteric methane, and investment in producer-focused extension and advisory services.

Livestock SA supports a collaborative approach in which government works with industry, researchers, advisers, Landscape Boards, value-chain participants and producers to ensure future investment is evidence-based, regionally relevant and focused on practical outcomes for South Australian livestock businesses.

Key recommendations

Livestock SA recommends that the updated Roadmap:

1. publish an action-by-action implementation and expenditure report for the 2022-26 Roadmap before the update is finalised;
2. retain productivity, profitability, resilience and food and fibre production as explicit outcomes;
3. clearly distinguish emissions measurement and reporting, on-farm emissions reduction, supply-chain insetting and participation in carbon or environmental markets;
4. support nationally consistent accounting standards, calculators, reporting tools and regional benchmarks;
5. strengthen independent, livestock-specific advisory and extension capability, supported by nationally consistent competence and quality-assurance arrangements;
6. advocate for practical livestock ACCU methods and mitigation pathways suited to sheep, beef, dairy, mixed-farming, extensive grazing and pastoral systems;
7. prioritise practical methane, genetics, pasture, herd and flock productivity, soil and measurement research that demonstrates producer value;
8. establish clear safeguards for producer data, contracts, claims and the conduct of market intermediaries;
9. monitor effects of carbon and natural-capital markets on productive land, regional economies and food and fibre production; and
10. assign clear responsibilities, timeframes, investment commitments, outcome measures and public reporting requirements to each Roadmap action.

These recommendations respond to the consultation questions concerning Livestock SA's role and priorities, the effectiveness of the existing Roadmap, opportunities and barriers, necessary enablers, trusted information channels, future government priorities and the treatment of co-benefits and biodiversity.

General Comments

An action-by-action implementation report should be published before the updated Roadmap is finalised

The review and update of the Roadmap is an important opportunity to ensure South Australian Government policy, funding and program delivery are directed to measures that most effectively support producers to reduce emissions, sequester carbon, improve soil health, protect biodiversity and participate in emerging natural capital opportunities.

Future implementation must be evidence-based, commercially realistic and regionally relevant, while supporting producers to maintain profitable food and fibre production and contribute to South Australia's climate and environmental objectives.

Livestock SA acknowledges the achievements summarised in the Carbon Farming Roadmap – Key Achievements 2024-25 and the findings of the 2025 review identified in the discussion paper.

Before the updated Roadmap is finalised, PIRSA should publish an action-by-action implementation report identifying expenditure, outputs, outcomes, incomplete work, lessons learned and the proposed treatment of each existing action. Industry should have an opportunity to provide practical input on that report and the priorities carried forward.

Policy coordination and producer guidance should be improved

Since the release of the Roadmap in November 2022, the policy and investment landscape for agriculture, climate mitigation, carbon farming and natural capital has become significantly more complex.

Agriculture is now embedded across multiple South Australian Government processes including *South Australia's Net Zero Strategy 2024–2030*, the Climate Change Resilience and Adaptation Actions framework, the Premier's Climate Change Council, the *Biodiversity Act 2025*, emissions-reduction initiatives, carbon farming demonstrations, natural capital reporting and livestock sustainability programs.

The South Australian Government is also party to the National Statement on Climate Change and Agriculture, which commits Commonwealth, state and territory agriculture ministers to work with the sector on climate-smart agriculture, productivity, adaptation and low-emissions pathways.

At the Commonwealth level, producers are also navigating the Agriculture and Land Sector Plan, the Carbon Farming Outreach Program, Nature Repair Market reforms, ACCU Scheme reviews, the Climate-Smart Agriculture Program, evolving greenhouse gas accounting requirements and mandatory climate-related disclosure obligations.

Mandatory climate-related disclosure obligations will result in livestock producers supplying large corporations facing increasing requests for emissions data and natural capital information to support Scope 3 reporting. This makes it an imperative that producers must be assisted in a timely and practical manner, despite having economy-wide targets.

Livestock SA is concerned that the interaction between local, state and Commonwealth initiatives remains complex and difficult for producers to navigate. Government policies and initiatives should

be better coordinated, avoid duplication, build on previous investment and learning, and provide producers with clear, consistent and practical guidance.

Measurement and reporting, on-farm emissions reduction, supply-chain inseting and participation in carbon or environmental markets are related but distinct pathways. Producers may need to measure or report emissions without selling offsets or transferring ownership of emissions reductions. Roadmap guidance should clearly explain the costs, contractual consequences, data requirements, claims and potential double-counting risks associated with each pathway.

Future climate-related regulation should avoid duplication and competitive disadvantage

Any future state climate-related regulatory requirements affecting primary production should be developed through a separate, meaningful consultation process and coordinated with Commonwealth reporting systems and established industry sustainability frameworks.

Regulatory requirements should avoid duplication, minimise unnecessary compliance costs, recognise credible emissions-reduction, carbon-sequestration and resilience activities, and avoid placing South Australian livestock businesses at a competitive disadvantage.

The updated Roadmap should not create additional regulatory obligations. Where related regulatory proposals emerge, they should have a clearly defined scope, transparent thresholds, proportionate transition arrangements and meaningful industry consultation.

The next Roadmap must recognise productivity and food security

Livestock producers must be recognised in legislation, policy and program design as essential contributors to food security, regional economies and sustainable food and fibre production. The *National Statement on Climate Change and Agriculture*, endorsed by the Commonwealth, state and territory governments, recognises that agriculture underpins food and fibre production, food security, regional economies and broader national outcomes. The South Australian Government should ensure these commitments are reflected in the updated Roadmap.

“Agriculture underpins several important outcomes, including food and fibre production, food security, thriving regional economies and opportunities for development on other countries... All agriculture ministers remain committed to maintaining and enhancing these fundamental roles for Australian agriculture...”

Carbon farming and emissions-reduction policy should support, rather than displace, productive agricultural activity. The updated Roadmap should recognise that productivity improvements are a key pathway to lower emissions intensity, stronger farm business resilience and continued food and fibre production. Policies that encourage carbon sequestration must be designed so they complement livestock productivity, land condition and long-term carrying capacity, rather than reduce the productive use of agricultural land.

Demand for carbon sequestration projects is increasing as high-emitting industries seek access to carbon credits to meet offsetting obligations. This demand may place increasing pressure on productive agricultural land, including land currently used for livestock production.

Changes in demand for high-integrity credits through compliance and voluntary markets may affect land values and competition for productive agricultural land. The South Australian Government

should monitor material changes in land use, agricultural production, regional employment and community impacts.

Livestock SA recommends that the South Australian Government actively participate in national policy discussions to protect food security, productive agricultural land and the long-term competitiveness of livestock businesses.

It is noted that the *SA Net Zero Strategy 2024–2030* includes an action to develop a carbon sequestration potential program for privately held land.

Pillar 1: Develop an enabling policy and regulatory framework

Clear guidance is needed on legislative and approval interactions

Livestock SA welcomed amendments to the *Pastoral Land Management and Conservation Act 1989* that clarify carbon farming and conservation activities on pastoral leases, while ensuring that the primary purpose remained pastoralism. However, producers need clear, practical guidance on how these provisions interact with state government native title, native vegetation, and biodiversity legislation, and recent amendments to the *Environmental Protection and Biodiversity Conservation Act*.

Government should provide plain-English guidance on approval requirements across native title, native vegetation, biodiversity and Commonwealth environmental laws. Agencies should improve coordination so producers can understand obligations before committing to carbon farming or natural capital projects, and approvals should be streamlined where possible while protecting environmental and cultural values.

Producers require transparent and trustworthy carbon-market services

The updated Roadmap should improve producer understanding of the commercial, legal and land-use implications of carbon and environmental-market agreements. Guidance should address contract duration, permanence and reversal obligations, project and auditing costs, ownership of data and environmental attributes, restrictions affecting land, treatment of natural disturbances, claims and double counting, and the roles and remuneration of advisers, aggregators and project developers.

Government should work with industry to support transparent service standards, disclosure of conflicts of interest and access to genuinely independent legal, financial and technical advice.

Livestock producers should be incentivised to participate in carbon farming

Agriculture delivers significant public benefits, including carbon sequestration, biodiversity protection, environmental stewardship and improved landscape resilience. These contributions are not always adequately recognised or rewarded through current market or policy settings. Carbon farming can provide a practical pathway for producers to be recognised for environmental work they already undertake and for future practice change that delivers verified carbon, biodiversity and natural capital outcomes.

Livestock SA considers that producers should not be expected to bear the full cost of emissions reduction where outcomes provide broader public, market and supply-chain benefits. Future policy should explore fair cost-sharing mechanisms across the red meat and wool value chains, including

government co-investment, market incentives and recognition of emissions-reduction outcomes within existing biodiversity and regeneration reward systems.

Livestock SA supports market-based incentives and co-investment models that make carbon farming commercially practical for livestock businesses and encourage voluntary participation rather than imposing unfunded practice change on producers.

A range of Australian Carbon Credit Unit (ACCU) Scheme methods should be available to producers

Livestock SA welcomes the prioritisation of a new livestock ACCU method to replace the expired Beef Cattle Herd Management method, while noting that practical carbon-market opportunities remain limited for many livestock enterprises.

The South Australian Government should advocate for the new livestock method and other relevant methods to be workable across sheep, beef, dairy, feedlot, mixed-farming, intensive and extensive grazing and pastoral systems, with monitoring, verification and transaction costs proportionate to likely producer returns.

Future method development should also recognise goat enterprises and mixed-species grazing where they deliver credible emissions-reduction, vegetation-management or landscape outcomes. Methods must be workable for northern rangelands and pastoral systems, where seasonal variability, scale, tenure arrangements and monitoring costs affect project feasibility.

Carbon farming rules should properly account for drought, fire, flood and other natural disasters so producers are not unfairly penalised for carbon losses beyond their control.

Pillar 2: Progress research, innovation and market development

A nationally consistent data and benchmarking framework is needed

Livestock SA acknowledges the data and mapping work already completed through carbon planting analysis and the *SA Soil Carbon Benchmarks and Data Analysis*. However, further work is required to ensure producers have access to nationally consistent, locally relevant data and benchmarking tools that support practical decision-making.

A nationally consistent data and benchmarking framework should enable producers to establish credible baselines, access regional benchmark data, use carbon accounting tools suited to local conditions, compare performance against industry and regional benchmarks, and better quantify carbon sequestration and emissions-reduction opportunities on their own properties.

A stronger region-specific economic evidence base is also needed so producers can assess the costs, risks, returns and feasibility of carbon farming across pastoral, sheep, beef, mixed-farming and rangeland systems.

Roadmap-funded demonstrations and extension should report full establishment and operating costs, labour requirements, production effects, technical and market risks, durability, transaction costs and net farm-business returns, rather than technical abatement potential alone.

Carbon-farming data from agricultural enterprises, research, demonstrations and government programs should be de-identified and used to improve free regional benchmarks, with transparent

governance oversight. Safeguards should address informed consent, ownership, access, portability, aggregation, confidentiality, permitted commercial and third-party use, and the allocation of emissions reductions or removals between producers and value-chain participants. Producer data should not support claims beyond the purpose for which it was collected without informed consent.

It is noted that the *SA Net Zero Strategy 2024–2030* includes actions to develop a low emissions primary industries foundation program.

The South Australian Government will work with primary producers and supply chains across all primary industries sectors to support emissions measurement and reporting and inform practical management strategies to reduce emissions.

Methane accounting and practical mitigation

Enteric methane has different atmospheric behaviour from long-lived carbon dioxide. Livestock SA supports transparent reporting of individual greenhouse gases and clear communication of the different implications of short-lived methane and long-lived carbon dioxide.

Scientifically robust supplementary metrics, including GWP*, may improve understanding of the temperature contribution of changing methane emissions. Supplementary reporting should complement, rather than unilaterally replace, internationally recognised inventory and supply-chain reporting frameworks. Farm, product and supply-chain accounting should treat methane, land-sector emissions, removals and biogenic carbon flows consistently, transparently and without double counting.

Current research and development have not yet identified a universally practical solution that consistently delivers deep enteric methane reductions, can be commercially adopted at scale, and is suitable for South Australia's extensive livestock production systems, which occur on over 50 per cent of the state's landmass (and over 80 per cent of the state's agricultural land).

Investment priorities should distinguish technologies suited to controlled-feeding systems from those that can be practically and continuously delivered in extensive sheep, beef and pastoral operations. Independent evidence of mitigation efficacy, animal safety, commercial practicality, production effects and producer value should be required before broad adoption is promoted.

Research and development therefore remain critical. While the sector is investing heavily in methane reduction, further work is needed to develop commercially viable options for broadacre sheep and beef systems, particularly breeding enterprises and other extensive grazing operations.

It is noted that the *SA Net Zero Strategy 2024–2030* includes an action to develop and implement a methane reduction program.

The South Australian Government will work with industry to design and implement integrated measures for reducing on-farm methane emissions across the short, medium and long term. This includes supporting research and development on viable emerging technologies and developing adoption and uptake pathways with industry.

Pillar 3: Build knowledge and skills

Trusted information, tools and capability building are required for carbon farming

There remain significant skills and knowledge gaps across the livestock sector, particularly in relation to the practical implications, opportunities, costs and actions required at the producer level. These gaps should be addressed through locally delivered capability-building programs supported by a nationally consistent framework, so producers receive clear, credible and relevant advice that can be applied to their own enterprises.

Livestock SA considers that stronger participation in carbon farming and emissions reduction will depend on producers having ready access to trusted, regionally relevant and evidence-based information, tools, advice and benchmarks. Information must be practical and capable of being applied to the diverse climatic, geographic and enterprise conditions experienced by South Australian livestock producers.

At present, carbon farming information remains dispersed across PIRSA, Landscape Boards, Commonwealth programs and external providers. This makes it difficult for producers to identify guidance that is current, credible, independent and relevant to their business circumstances.

Government should improve coordination across existing and emerging tools, terminology and reporting expectations so producers can compare available options, understand their suitability for different enterprise types and apply them confidently to South Australian conditions. Future guidance should align with voluntary national frameworks while remaining practical for livestock businesses, including sheep, beef, mixed-farming and goat enterprises.

Building knowledge and skills also requires trusted carbon farming advisers

Livestock SA considers that adoption of proven low-emissions and carbon farming practices remains uneven and should be supported through practical, producer-led extension tailored to South Australian livestock systems.

A lack of confidence, technical support and trusted advice remains a barrier to participation in carbon farming, emissions accounting and environmental markets.

Future programs should strengthen livestock advisory networks and producer groups, provide mentoring and practical training, and be developed with peak industry bodies to ensure advice is commercially relevant and livestock-specific.

The Roadmap should support nationally consistent competence, accreditation or quality-assurance arrangements for advisers providing carbon, emissions-accounting and environmental-market advice to producers.

Carbon farming outreach should be producer-focused, productivity-oriented and industry-led, helping producers assess emissions reduction, ACCU opportunities, natural capital markets and decision-support tools.

Pillar 4: Engage, collaborate and partner

Engagement, collaboration and partnerships for effective carbon farming delivery

Livestock SA acknowledges existing partnerships between government, industry, research organisations, Landscape Boards and Commonwealth programs. The next Roadmap should focus these partnerships on delivering measurable, practical outcomes for livestock producers.

Stronger coordination is needed to provide consistent messages to producers and value-chain participants, reduce program fragmentation, align carbon farming credentialling with existing assurance and ESG frameworks, and build producer confidence.

Future initiatives should be developed in partnership with industry and informed by science, practical experience and lessons from implementation to date. This will help ensure investment is coordinated, advice is credible and delivery is relevant to South Australian livestock systems.

Measurable implementation and public accountability

Each updated Roadmap action should identify the responsible lead and delivery partners, commencement and completion timeframes, committed and anticipated investment, measurable output and outcome indicators, producer-adoption and producer-value measures, regional applicability, evaluation arrangements and criteria for continuation, modification or cessation.

Livestock SA supports an updated Carbon Farming Roadmap that gives livestock producers practical, credible and commercially relevant pathways to measure and improve emissions performance, participate voluntarily in carbon and natural-capital opportunities, and demonstrate the broader environmental outcomes delivered through productive agriculture.

The updated Roadmap should not be judged solely by the number of projects registered, hectares enrolled or credits generated. Success should also be measured through producer capability, farm-business value, productivity and resilience outcomes, trusted and nationally consistent reporting, practical adoption across diverse South Australian production systems, and the protection of productive agricultural land and regional communities.

Livestock SA looks forward to continuing to work with PIRSA, other government agencies, research organisations and industry to translate these priorities into measurable actions, clear responsibilities and transparent implementation reporting.

Yours sincerely

Travis Tobin
Chief Executive Officer