



Livestock SA Limited

ACN: 681 162 667 | ABN: 53 681 162 667

PO Box 211, Goodwood SA 5034

Adelaide Showground, Leader Street, Wayville SA 5034

P: 08 8297 2299 | E: admin@livestocksa.com.au | W: livestocksa.com.au

SUBMISSION

9 September 2026

Biodiversity Coordination Unit
Department for Environment and Water
GPO BOX 1047
Adelaide SA 5001
Via email: biodiversityact@sa.gov.au

Dear Coordination Unit

Re: Biodiversity Act 2025 – Draft Regulations (statutory bodies)

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.

We welcome the opportunity to comment on the draft regulations governing the statutory bodies established under the *Biodiversity Act 2025* (Act).

Livestock SA supports independent, expert statutory bodies to implement the Act. These bodies will significantly influence advice to government and the development, approval and application of biodiversity policies and guidelines.

We broadly support the proposed membership ranges, limits on Public Service membership, appointment methods and decision-making procedures. Our principal concern is that regulation 5 does not expressly require practical agricultural or pastoral expertise on the Clearance Assessment Committee.

The Committee will assess and determine native plant clearance applications, including matters referred through the planning system; make decisions regarding the destruction, damage or disturbance of critical habitat; apply the Significant Environmental Benefit policy; provide expert advice on native plant matters; and initiate enforcement action relating to unlawful clearance. The Committee's decisions and advice may have direct operational, financial and regulatory implications for agricultural and pastoral businesses. They must therefore be informed by practical knowledge of commercial primary production, extensive grazing systems and regional land management.

The proposed reference to 'land use or land management' is too broad. It could be satisfied without any committee member having direct experience in operating an agricultural or pastoral enterprise.

Livestock SA therefore recommends that:

1. regulation 5(2)(a) be amended to include “primary production, including practical agricultural and pastoral land management” as a prescribed area of expertise;
2. at least one member of the Clearance Assessment Committee be required to have substantial, current or recent practical experience in commercial primary production or pastoral land management; and
3. the Minister be required to have regard to regional diversity and experience across South Australia’s agricultural and pastoral landscapes when making appointments.

Livestock SA supports the proposed limit on Public Service membership. However, committee independence and credibility will also depend on achieving an appropriate balance between regulatory, scientific and practical land-management expertise.

These amendments would strengthen producer confidence, improve the quality and practicality of decision-making and help ensure biodiversity objectives are delivered without unnecessary uncertainty, delay or regulatory burden for landholders.

Livestock SA looks forward to continuing to work constructively with the Department for Environment and Water as the remaining regulations, policies and guidelines are developed.

Yours sincerely

Travis Tobin
Chief Executive Officer