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

20 October 2026

Ashley Smith
Senior Policy Officer
Environment Protection Authority
GPO Box 2607
ADELAIDE SA 5001

Via email: yourepa@sa.gov.au

Dear Ms Smith

Re: Submission to *Local Nuisance and Litter Control Consultation 2026*

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 industries.

Livestock SA welcomes the opportunity to provide a submission to the *Local Nuisance and Litter Control Consultation 2026,* which is important to our members and industries. There is a strong interest in ensuring regulatory settings recognise the practical realities of primary production while maintaining appropriate protects for the environment and community.

Livestock SA supports excluding impacts arising from activities reasonably undertaken in the normal course of primary production from constituting local nuisance under the *Local Nuisance and Litter Control Act 2016* (LNLC).

Primary production necessarily occurs in the landscape and may generate noise, dust, odour, smoke, fire and burning. As the discussion paper recognises, these impacts can become more evident where urban development is permitted near primary production areas.

The existence of such impacts should not, of itself, mean that a producer is creating an unreasonable local nuisance.

Livestock SA nevertheless supports retaining appropriate responsibilities for genuine environmental harm. The regulatory distinction should be between:

- reasonable impacts arising from legitimate primary production; and
- unreasonable conduct or environmental harm appropriately addressed under environmental protection, planning or other relevant legislation.

This distinction would give producers greater certainty while preserving environmental safeguards.

Livestock SA recommends that:

1. Noise and other nuisance impacts arising from activities carried on in the normal course of a primary production business should be excluded from constituting local nuisance under the *Local Nuisance and Litter Control Act 2016*.

The exemption should apply to impacts arising from activities undertaken in the normal course of a livestock production business.

These impacts are an unavoidable part of operating the business and should not, by themselves, constitute local nuisance.

A clear exemption for ordinary livestock production impacts would provide producers, regulators and communities with a consistent rule, rather than requiring a case-by-case assessment.

This exemption would not remove existing obligations under environmental protection and planning legislation. Genuine environmental harm, unlawful conduct and development or land-use matters would continue to be addressed under those established regulatory frameworks.

2. Primary production must be defined broadly and flexibly to accommodate supporting activities and evolving practices arising from agricultural innovation.

The exemption will be effective only if primary production is defined broadly and flexibly.

The discussion paper identifies established activities such as cropping, grazing, horticulture, viticulture and market gardening, but the definition should also accommodate supporting and evolving practices.

Livestock enterprises depend on supporting activities and will continue to change through agricultural innovation.

Relevant activities include, for example:

- grazing and livestock husbandry
- livestock handling, movement, mustering and yarding
- loading and unloading livestock
- feeding and watering livestock
- pasture establishment and management
- operation of agricultural machinery and vehicles
- property, infrastructure and fencing maintenance
- pest, weed and vegetation management
- biosecurity activities
- lawful fire and land-management activities
- operation of pumps, generators and other agricultural infrastructure
- adoption of new agricultural technologies.

These examples are illustrative, not exhaustive.

A broad and flexible definition will remain relevant as agricultural practices, production systems and technology evolve.

Livestock SA requests that the South Australian Government adopt this clear and practical framework to protect legitimate primary production from unreasonable nuisance claims while retaining safeguards for genuine environmental harm.

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