



SUBMISSION

11 August 2024

Roger Wickes PSM
Presiding Member
Pastoral Board of South Australia
Department for Environment and Water
Via email: DEW.Pastoral@sa.gov.au

Dear Roger

Re: Consultation – Change of Land Use Guideline

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. Representing over 5,200 sheep producers and more than 2,700 beef cattle producers across the state, we work to secure a strong and sustainable livestock sector. South Australia's \$4.3 billion livestock industry is a key economic contributor to the state which supports 21,000 South Australian jobs across the red meat and wool industries.

Livestock SA welcomes the opportunity to provide comment on the proposed changes to the current Pastoral Board Guideline, which is important to our members and industries.

Introduction

Following recent amendments to the *Pastoral Land Management and Conservation Act 1989* (Pastoral Act), section 22(6) allows the Pastoral Board to approve the use of pastoral land for purposes other than pastoral purposes, namely for conservation and carbon farming.

Livestock SA notes that the economic viability of the pastoral industry remains the object of the Pastoral Act. It is our understanding that the intent of the amendments to the Pastoral Act were to create the opportunity for pastoral land to be managed more flexibly, and that by including carbon farming and conservation activities on pastoral land, pastoralists could access the opportunity for generating alternative revenue sources.

We also note that when the Pastoral Board approves a change to the use of the pastoral lease land, it remains in force unless the lessee seeks a further change.

As such, we provide the following feedback on the proposed changes and new content to the current Pastoral Board Guideline.

Use of Pastoral Land for Non-Pastoral Purposes

1. *Renaming the guideline to “Change of Land Use” to better reflect the range of potential changes from pastoral to conservation or other uses, and potential changes back to pastoral uses.*

Livestock SA does not consider there is a need to change the name of the guideline. We support retaining the name “Use of Pastoral Land for Non-pastoral Purposes”.

2. *Updating wording throughout, removing ‘non-pastoral’ and replacing with ‘alternate uses’.*

Livestock SA does not support the proposed word replacement. It is our understanding that the intent of the amendments to the Pastoral Act were to create the opportunity for pastoral land to be managed more flexibly and enable pastoralists to incorporate carbon farming and conservation activities on pastoral land to generate alternative revenue sources. We were not advised that the policy intent was to shift the main use of the pastoral estate away from pastoralism, so it should remain prominent in language relating to land use changes – ‘non-pastoral’ recognises this.

3. *Addition of carbon farming and conservation definitions, as per Pastoral Act amendments.*

Livestock SA support these amendments.

4. *Clarifying conservation can be the ‘primary purpose’ across an entire lease with approval from the Board, and that approval to revert to pastoral purposes will also require Board approval.*

Livestock SA support this amendment and request that the Pastoral Board also develop a clear set of the steps required to return an entire lease back to pastoralism as the primary purpose.

5. *Clarifying that carbon farming can be approved in conjunction with either pastoral or conservation purposes.*

Livestock SA support this amendment.

6. *The addition of a new section on ‘alternate land purposes’ to provide greater detail on what may be considered an alternate land use, and specific information on conservation and carbon farming.*

Livestock SA questions the need for this addition. It appears unnecessary given ‘5.3 Approval is required to change the purpose of a lease from an approved alternate purpose back to pastoral purposes (i.e. from conservation to pastoral purposes)’. We request more detail on the specific information for conservation and carbon farming that is being proposed.

7. *The addition of a new section of conditions of approval under section 22(7) to outline the types of conditions that the Board may impose on approvals, including consideration of matters such as moving to zero stock maximum and decommissioning of waterpoints that are of particular relevance to conservation purpose approvals.*

Livestock SA support this section and request that in considering the decommissioning water points, the Pastoral Board also consider the relevance this will have on abutting properties used for pastoral purposes.

8. *The legislative context has been updated throughout the document in line with the Pastoral Act amendments, as well as the extracts from the Pastoral Act which have been shifted to an Appendix.*

Livestock SA support these amendments.

9. *Further additions to the Appendix include information on Native Title, including Indigenous Land Use Agreements, Aboriginal Heritage and Native Vegetation.*

Livestock SA support these amendments.

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

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Travis Tobin', is positioned above the typed name.

Travis Tobin
Chief Executive Officer