



Australian Pork
Limited



18 February 2025

SA Department for Environment and Water
Via [YourSay](#).

South Australia's Draft Biodiversity Bill

Australian Pork Limited (APL) and Pork SA appreciate the opportunity to provide a submission on South Australia's Draft Biodiversity Bill.

About the Australian pork industry, Australian Pork Limited (APL) and Pork SA

APL is the peak national representative body for Australian pork producers. It is a producer-owned company combining marketing, export development, research and innovation, and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry.

APL is the primary contact regarding pork industry research, development and extension priorities, current industry evidence and information, and strategic policy needs. APL is unique in this way and is the one body representing every aspect of the Australian pork industry. APL holds several official roles on behalf of the Australian pork industry. APL is:

- The Rural Research and Development Corporation for the industry. Established through Federal legislation, APL is responsible for leading research, development and extension in partnership with the Australian government and the research community. Our statutory obligation is to deliver industry innovation and research and development services on behalf of all industry levy payers.
- The market access, trade and marketing arm of the industry, including managing industry campaigns such as "Get some pork on your fork".
- The national peak body for the Australian pork industry. We represent pork producers and the supply chain across jurisdictions and within national and state and territory representative frameworks.
- Leading the Australian pork industry's Sustainability Framework implementation supporting benchmarking and accountability against the goals within the four sustainability pillars.
- The pork industry signatory to the Emergency Animal Disease Response Deed (EADRA), representing the entire pork supply chain within Animal Health Australia, and where required, within the decision-making structures which would manage an emergency animal disease response.

Pork SA is the State Farming Organisation representing the South Australian pork industry. Key roles include Government Liaison (providing industry context into development of policy, legislation and regulation), and industry development.

APL and Pork SA are pleased to collaborate on preparing feedback on this important initiative in South Australia.

The domestic pork industry is a vital part of Australia's food supply chain, with pork the second most consumed meat in Australia and all fresh pork consumed in Australia domestically sourced. The industry is domestically focused with approximately 90% of total production supporting food security for Australians.

The Australian pork industry contributes around \$6 billion in gross domestic product to the economy. Approximately 34,600 jobs are supported by the industry nationally, predominantly in regional Australia, supporting the economic and social prosperity of communities and the wellbeing of individuals. The Australian pork industry's workforce is skilled, specialised and generally engaged on a permanent basis. Approximately 20% of national production occurs in SA.

Australian Pork Sustainability Framework

The Australian pork industry is deeply committed to the care of its pigs, the environment, people, and communities, with producers providing Australians and overseas markets with safe, reliable and nutritious food. In 2021 APL launched its first-ever pork industry Sustainability Framework. The Sustainability Framework set goals, targets, and measures to demonstrate the industry's commitments across four key areas:

- **People** – Producing our products in a way that supports both our industry's people and our local communities.
- **Pigs** - A world leader in animal welfare and health.
- **Planet** - A world leader in environmental best practice.
- **Prosperity** - A revolutionary contributor to Australia's economy and those who work within the sector.

A peer reviewed lifecycle assessment published in the internationally recognised journal - *Animal Production Science* - measured the pork industry's positive environmental impact. Finding that Australian pork has minimal nutrient loss compared with grazing systems and European pig farms. The journal publication can be found here:

<https://www.publish.csiro.au/an/Fulltext/AN23352>. And the APL full report is here: <https://australianpork.com.au/life-cycle-assessment-pork-industry-2020-2022>

The recently released [Australian Pork Sustainability Framework Baseline Report](#) found that:

- Pork producers have embraced the circular economy including:
 - 73% reductions in emissions intensity since 1980;
 - 78% of pork producers reuse effluent on crops;
 - 49% use solar power;
 - 44% recycle water on farm; and
 - 58% compost bedding and manure.
- The industry is building the foundations for the future by investing in research, with over 10 higher degree research students currently supported by the pork industry.
- The integrity of pork products is at the core of the industry, with more than 90% of the industry covered by the 3rd party, annually independently audited [APIQ[✓]](#)® quality assurance program.

Summary of APL/Pork SA Recommendations

- **Clarify what 'permanent degradation' means in the context of legacy plantings on farm properties and instead consider excluding farm plantings of 20 years or more from clearance controls under schedule 2 of the Bill.**
- **Clarify the functions and extent of the General Environmental Duty and the General Biodiversity Duty to ensure that there is no duplication.**

Areas of Concern with the proposed Bill

Legacy tree plantings of more than 20 years

APL and Pork SA do not support changes that would require legacy native tree plantings of 20 years or longer to be subject to native plant clearance consent processes. Farm development applications for buildings and other structures in South Australia have regularly included voluntary provisions for farmers to establish native plantings for shade or screening purposes. Native plants have generally been used due to their drought tolerance. As farms expand production and new production methods are taken up, these plantings may need to be removed and replaced. Requiring consent before these trees can be cleared would increase green tape, cost and time for businesses.

We note that the Draft Bill Schedule 2 (the unregulated activities schedule) proposes that 'farming and grazing does not require clearance consent if it does not result in permanent degradation'. This new wording needs to be clarified, particularly in the context of plantings of 20 years or over. In many cases any vegetation removed for expansion of farm buildings are likely to be replaced in another area on farm, resulting in no net loss in vegetation. New plantings will eventually grow to replace any biodiversity lost through removing more mature vegetation, therefore not resulting in 'permanent degradation'.

Draft Schedule 2 also sets out that '*clearance controls on private land do not apply to intentionally sown plants that are less than 20 years old, or to planted native plants more than 20 years old in private gardens and growing in commercial forests or to fungi and algae unless they are a prescribed species*'. APL and Pork SA request that consideration be given to adding plantings on commercial farm properties to this list in order to remove any complication about what is 'permanent degradation' and to avoid adding unnecessary green tape to farm businesses.

APL/Pork SA Recommendation: Clarify what 'permanent degradation' means in the context of legacy plantings on farm properties and instead consider excluding farm plantings of 20 years or more from clearance controls under schedule 2 of the Bill.

Clarify the extent of the General Biodiversity Duty and potential duplication with the General Environmental Duty

The South Australian pork industry is already subject to a General Environmental Duty (GED), as administered by EPA South Australia. This GED requires all South Australians to '*not undertake an activity which pollutes the environment unless that person takes all reasonable and practicable measures to prevent or minimise environmental harm*'. Some incidents that would impact on biodiversity, for example a spill of effluent into a waterway, are already covered effectively under the GED, but would also likely be considered under the proposed General Biodiversity Duty (GBD) as '*the impairment or loss of ecosystem functions*'. The demarcation between the GED and the GBD must be clarified in the proposed Bill so there is no duplication of effort or confusion between the different administrators of the GED and GBD.

Pork SA and APL would welcome the opportunity to support officers, authorised to administer the requirements, to gain an understanding of pig farming prior to undertaking enforcement activities. There are key differences between the pork industry and extensive agricultural sectors, not least of which are the strict biosecurity requirements which must be met prior to entering a pig farm. We would welcome the opportunity to brief the officers.

APL/Pork SA Recommendation: Clarify the functions and extent of the General Environmental Duty and the General Biodiversity Duty to ensure that there is no duplication.

The Australian Pork industry produces healthy, sustainable and low emissions protein to feed Australians and for export, contributing to the local and national economy and supporting communities. The industry recognises the need to support biodiversity as a bedrock of the environmental services on which our production is based. However, the proposed Biodiversity Bill may introduce unintended consequences for farm environments, operation and costs, and these need to be carefully considered and clarified. We look forward to clarifying and resolving these issues in partnership with the South Australian Government.

Thank you again for the opportunity to provide a submission. Should you wish to discuss this submission, please contact [REDACTED] Policy Manager Environment and Sustainability at Australian Pork Limited, on [REDACTED] or [REDACTED]

Yours sincerely,

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