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5 May 2015

Mr Russell Seaman
Department of Environment, Water and Natural Resources
GPO Box 1047
ADELAIDE SA 5001
(Email nvc@sa.gov.au)

Dear Mr Seaman

I wish to thank the Native Vegetation Council for the copies of the two draft guidelines in relation to changing stock species, and the opportunity to comment.

In principle, both these guidelines are straight forward and fit within the current legislative requirements.

Under the policies of the Pastoral Board, stock are "any animal on a pastoral lease that is part of a commercial enterprise under the lease." Currently this covers cattle and sheep.

The changing of domestic stock species to camels raises several issues such as responsibility for upgrading boundary fences, procedures where a lease running camels is sold, and the possible allowance of other pest animals as stock for commercial use.

Currently under the policies of the Pastoral Board, where a lessee proposes to change their classes of domestic livestock, they are responsible for any upgrade above the standard boundary fence to contain their stock. This means where a lessee has been running Merinos and wants to change to cattle or non-Merino sheep (such as Dorpers or Damaras), that lessee is responsible for upgrading the boundary fences. This also needs to apply if any lessee (or anyone else in the pastoral region) wants to change to camels.

Consideration also needs to be given to policing what happens if a lease running camels is sold and the new lessee does not provide the necessary infrastructure upkeep, does not cull/sell animals to keep numbers in check, or does not want to continue with camels.

If the farming or pasturing of camels is going to be allowed, why stop at camels? In the first instance consideration should be given to allowing goats as well. Livestock SA is under increasing pressure to support goat grazing on pastoral land both from the State Government and those lessees with significant feral goat numbers, particularly in the eastern pastoral regions.

The Premier has listed as the State Government's second economic priority "Premium food and wine produced in our clean environment and exported to the world." As part of this, it is estimated that South Australia's livestock industry is currently worth about \$6 billion annually. Cattle and sheep in the pastoral region are estimated to be worth \$130 million.

If the pastoral region is to continue to be a contributor towards achieving the Government's second economic priority, while it is necessary to concentrate on improving and increasing the returns from cattle and sheep, other opportunities also need to be found.

It is pleasing that through this new draft guideline that camels can now be commercially considered. However as there are already established markets for goats and goat meat, the State wants and needs increased economic returns from the feral goat population that already exists in this State. All relevant organisations including the Native Vegetation Council, Pastoral Board, SA Arid Lands NRM Board and Livestock SA need to consider how this can be done while ensuring the concerns of pastoralists and for the environment are addressed.

Yours sincerely

Geoff Power

President Livestock SA