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Department of Environment and Water  
South Australian Department for Environment and Water  
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11 February 2025

Dear Pastoral Board,

**RE: Submission on draft Pastoral Board Guideline – Permanent Increase to Pastoral Lease Stocking Maximum**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission on the draft Pastoral Board Guideline for the Permanent Increase to Pastoral Stocking Maximum.

ALCA represents organisations that work to conserve, manage, and restore nature on privately managed land. Our member conservation efforts influence across over 3 million square kilometres with more than 4,000 landholders; we have over 70,000 supporters and our combined annual turnover exceeds \$370 million.

As you would be aware, three of ALCA's member organisations – Nature Foundation, Bush Heritage Australia, and the Australian Wildlife Conservancy – hold leases within the South Australian rangelands, and a fourth, Arid Recovery, also operates on South Australian leasehold land.

## Feedback

In principle, ALCA supports a clear formal process for seeking to increase permanent stocking rates out-of-cycle from the current 14-year land condition assessment cycles.

We are also supportive of the proposal to stage temporary approvals over 5 years before confirming any permanent increase to stocking rates, such that where degradation occurs there is still scope for the Pastoral Board to reverse course.

However, ALCA is concerned that the current land condition assessment process has not been sufficiently rigorous and robust. We further understand there are also ongoing resourcing constraints in conducting detailed land condition assessments in a timely manner according to the 14-year schedule. Insufficiently robust and resourced out-of-cycle assessments could result in a landscape-scale degradation of rangeland land condition. On this basis, **we strongly recommend that out-of-cycle assessments are not progressed until all 'in-cycle' assessments can be adequately resourced, and rigorously and robustly assessed.**

This approach would also help to safeguard the social licence and sustainability credentials of the pastoral sector.

## Recommendations

**Recommendation 1:** That until such time as 14-year cycle land condition assessments can be fully resourced to be timely, rigorous and robust, 'out-of-cycle' assessments should not be prioritised. The need to manage the overall condition of the rangelands should take primacy in guiding decisions on stocking maximums.

**Recommendation 2:** A detailed review of the existing 14-year cycle land condition assessment process should be completed, and the Pastoral Board fully satisfied with that process, before any 'out-of-cycle' assessments are resourced. ALCA understand that this work is underway.

However, if the Pastoral Board decides to proceed with prioritising 'out-of-cycle' assessments:

**Recommendation 3:** The Pastoral Board seek appropriations from the State Government to support the resourcing required to manage the workload that can be expected from additional, 'out-of-cycle' assessments

**Recommendation 4:** That changes to stocking maximums requires a more rigorous approach to monitoring and assessment than the suggested approach that is currently focused upon photopoints and rainfall. Specifically, this means either the use of a repeatable quantitative protocol which allows for the implementation of evidence-based decision-making (such as, for example, Jessup transects, see: *Pastoral Lease Assessment Technical Training Manual (2011)*<sup>1</sup>) or the well-considered utilisation of verified new technology such as remote-sensing.

**Recommendation 5:** In the interim, landholder-led monitoring is appropriate to assess progress, but independently evaluated monitoring should occur at the beginning and end of the evaluation periods (i.e. 'gateway / milestone monitoring').

**Recommendation 6:** That any assessment process for temporary or permanent increases to stocking rates be required to be undertaken by personnel not employed, and otherwise unconnected, to the leaseholder (i.e. no conflict of interest), in

**Recommendation 7:** That any application to seek an increase to permanent stocking rates should allow the Pastoral Board to make further inquiries as they see fit regarding the potential impacts on the lease; i.e. the following clause from the draft Guideline should be amended as follows (amendments in **bold**):

1.9 ~~If stock maximum applications are greater than 25% of the existing maximum listed on the lease title,~~ **The Board may seek additional supporting information or management strategies to help inform understanding of any potential impacts on the lease.**

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<sup>1</sup> See: <https://cdn.environment.sa.gov.au/environment/docs/kb-gen-bdbsa-sapastoralfieldmanual.pdf>

**Recommendation 8:** In setting a Guideline, that the Board interrogates the presumption that water point expansion relates to improvements in pastoral lease development. There is strong evidence that waterpoints and the associated halo grazing effect (the 'piosphere effect') on vegetation surrounding these waterpoints *reduces* vegetation condition, rather than sustains or improves it.

Thank you again for the opportunity to provide feedback on the draft *Pastoral Board Guideline – Permanent Increase to Pastoral Lease Stocking Maximum*. ALCA and its members operating in the South Australian rangelands would welcome the opportunity for a discussion with the Pastoral Board to share the detail of our views further.

**Australian Land Conservation Alliance**

## About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

Our nineteen members are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nari Nari Tribal Council
- Nature Foundation
- North Australian Indigenous Land and Sea Management Alliance
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund - Australia

ALCA member land conservation efforts have influenced over 9.3% of Australia with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$370 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spill-over effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.