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Michael Garrod
General Manager
Hills and Fleurieu Landscape Board
8/22 Mann Street
Mount Barker

By email: hf.landscapeboard@sa.gov.au

6 March 2026

Dear Mr Garrod

RE: Hills and Fleurieu Regional Landscape Plan and Net Zero Strategy for Agriculture

Thank you for the opportunity to provide comment on the draft *Hills and Fleurieu Regional Landscape Plan 2026-31* (the Plan).

Primary Producers SA ('PPSA') is the peak industry body representing the interests of South Australian primary producers and is the South Australian member of the National Farmers Federation. Our members are the peak commodity organisations of South Australia. Current members include Grain Producers SA, Livestock SA, SA Dairyfarmers' Association, SA Forest Products Association, Horticulture Coalition of SA, and the Wine Grape Council of SA.

At the heart of PPSA's mandate is the protection and advancement of South Australia's primary industries, together with the people, communities, livestock, plants and natural resources that sustain therm. We believe it is essential for industry and government to work in genuine partnership to design policies and investments that strengthen primary industries while ensuring the responsible management of the state's natural resources and landscapes.

This submission follows our meeting on Monday 2nd March 2026 with you and members of your team during which we discussed the Regional Landscape Plan, Net Zero Strategy for Agriculture and Water Allocation Plans for the Hills and Fleurieu Region.

We thank you for taking the time to meet with us for this constructive meeting that enabled us to better understand the position of the Hills and Fleurieu Landscape Board in relation to the Regional Landscape Plan and approaches to other issues. As was emphasised during the meeting, early and substantive engagement with the agricultural industry will be essential to the effective delivery of a large range of objectives in the Plan. We look forward to continued interaction as we work together on a range of policy issues and program priorities.

This submission formalises some of the feedback provided during that meeting, as well as providing further detailed feedback on a range of priorities, objectives and actions in the Plan.

Should you require any further information, please do not hesitate to contact admin@ppsa.org.au

Thank you for your consideration of our submission.

Yours sincerely



Caroline Rhodes

Chief Executive Officer, Primary Producers SA

Copy:

Ben Bruce, Chief Executive, Department of Environment and Water (DEW)

Prof Mehdi Doroudi, Chief Executive, Dept of Primary Industries and Regional Development SA (PIRSA)

PRIMARY PRODUCERS SA (PPSA)

Submission in response to the Hills and Fleurieu Regional Landscape Plan

Date of submission: Friday 6th March 2026

Submission: Hills and Fleurieu Regional Landscape Plan

Introduction

Primary Producers SA (PPSA) has reviewed the draft *Hills and Fleurieu Regional Landscape Plan* (hereafter 'the Plan'). Following our summary of key messages below, we provide feedback on each of the priorities and objectives.

Key Messages

- **PPSA strongly supports a focus of landscape levy investment in programs that underpin core Landscape Board priorities of water, soil health and pest animal and weed management. Expansion into broader climate and biodiversity initiatives should not dilute investment in these core functions.**
- **It is noted that regulatory approaches are listed in the Plan and PPSA emphasises that these should priorities education, partnerships and incentives ahead of compliance and enforcement wherever possible. The cumulative regulatory burden on primary producers should be recognised and reduced.**
- **PPSA welcomes opportunities to work with the HF Landscape Board across a range of priorities, objectives and actions in the Plan. Early and substantive engagement with industry will be critical to ensuring the effective delivery of the objectives in the Plan and to ensure that policies and programs are developed in manner that aligns with industry priorities.**

PPSA at a glance

Primary Producers SA (PPSA) is the peak industry body representing the interests of South Australian primary producers.

PPSA also serves as the South Australian member of the National Farmers Federation (NFF). This ensures PPSA is directly engaged in all NFF activities including implementation of the Roadmap for Australian Agriculture to exceed $100 billion in farm gate value by 2030.

PPSA has the capacity to provide strong representation and advocacy on behalf of the South Australian primary production sector through our membership base.

Our members are the peak commodity organisations of South Australia. Current members include Grain Producers SA, Livestock SA, SA Dairyfarmers' Association, SA Forest Products Association, Horticulture Coalition of SA, and the Wine Grape Council of SA. Each organisation is represented by a councillor on the PPSA Policy Council, to provide direction and oversee the operations of PPSA.

Our purpose

As the united voice of South Australia's primary production sector, our purpose is:

- To **advocate the interests and concerns of Primary Producers** to both State and Federal governments and community using evidence-based reasoning;
- To **present one voice** to government, both State and Federal, and the wider community on Cross-Commodity issues affecting Primary Producers in South Australia;
- To **promote Primary Production in South Australia** and ensure that the contributions and achievements of South Australian Primary Producers are recognised; and
- To **assist stakeholders and suppliers to Primary Production** where such assistance will benefit Primary Producers.

What we do

PPSA develops the South Australian primary production sector through:

1. **Engagement**. PPSA partners with government and industry to develop policies and programs that promote the social, economic, and environmental sustainability of South Australian primary production.
2. **Leadership**. PPSA acts as the conduit to the South Australian primary production sector and presents a united voice on behalf of its membership in advocacy and representative activities.
3. **Communication**. PPSA influences policy makers by promoting the contribution we make to the South Australian economy and engaging positively with government and the broader community.

GENERAL FEEDBACK ON THE APPROACH OF THE PLAN

Alignment with State Landscape Strategy

The development Regional Landscape Plans for the period 2026-31 by Landscape Boards across South Australia does not align with the process for the new State Landscape Strategy which is currently in development.

It is not clear how the Regional Landscape Plans inform or are informed by the current State Landscape Strategy. The HF Plan outlines that it "adopts the enablers of the State Landscape Strategy", however as mooted revisions to the State Landscape Strategy are yet to be formally released for stakeholder consultation, it is difficult to see how these enablers can be relied upon with confidence.

PPSA has been engaging with the development of the revised State Landscape Strategy and will continue to provide input into the DEW process, specially as a named peak body under the Act.

Plan for the Region, not the organisation

PPSA understands that the Landscape SA Act is not prescriptive in its requirement for Landscape Boards to develop a Regional Plan that is focussed on either a region as a whole, or on a Landscape Board as an organisation. The Hills and Fleurieu Landscape Board has chosen to take a different approach to other Boards by choosing to develop a plan for the Hills and Fleurieu region, rather than a plan for the Hills and Fleurieu Landscape Board as an organisation.

This variation in approaches may be somewhat confusing for stakeholders, particularly those that have interests in more than one landscape jurisdiction.

PPSA recommends that future approaches to Regional Landscape Plans be aligned across landscape jurisdictions to ensure consistency and improve stakeholder engagement and understanding of the purpose of the Plan.

Role of Lead and Supporting Organisations

The Plan includes Action Tables that set out priorities and list actions that will be led by the Board and others by delivery partners. It is outlined that the Board's specific programs will be set out in its annual business plan.

PPSA has been specifically listed as a supporting organisation in one action (under strategy 5.1) but is included under the broad umbrella of 'industry' in many others. Whilst there are other actions that PPSA could have considered being listed as a supporting organisation, it would have been preferable to discuss this specific alignment more comprehensively prior to the publication of the draft for consultation. Unfortunately, we have not had prior engagement on defining this role.

To avoid confusion, it is recommended that the specific reference to PPSA as a supporting organisation be removed for 5.1 and PPSA's supporting role in this be industry included under the 'industry' banner.

Regulatory Burden

PPSA notes the Plan includes multiple references to compliance, enforcement and expanded regulatory oversight across climate, land and water objectives. **While compliance has an important role, policy settings must avoid cumulative regulatory burden that undermines farm productivity and investment confidence.** A proportionate, risk-based and incentive-led approach should be prioritised.

FEEDBACK ON REGIONAL PRIORITIES, OBJECTIVES AND ACTIONS

Community: Everyone caring for our landscapes

P1 Foster stewardship of land, water and nature

PPSA provides broad support for this objective as it is critical to ensure that all landholders understand their responsibilities to appropriately mange land and natural resources and adequately invest resources accordingly.

Primary producers have a strong incentive to implement sustainable land and water management practices as their livelihoods depend on their stewardship of natural resources.

We recognise that there is a diverse range of landholders in the Hills and Fleurieu region, many of whom own lifestyle properties and have different levels of skills, experience and motivation driving their approach to land, water and native vegetation management.

All landholders should be supported to manage their property according to their own objectives, within the bounds of legislative and regulatory parameters.

P2 Walk alongside First Nations in looking after Watta/Rue/Yerta (Country)

PPSA supports genuine, long-term partnerships between First Nations communities and landholders and recognises the intent to embed First Nations knowledge, leadership and stewardship within the Plan.

PPSA believes this priority must be underpinned by genuine partnerships between First Nations communities and landholders that are based on mutual respect, shared decision making and practical collaboration.

Climate: A net zero, climate resilient region

C1 Transition to net zero emissions

PPSA strongly opposes the concept of a sector-specific net zero climate target for the agricultural sector, highlighting that such an approach risks fragmenting national efforts and imposing unnecessary regulatory complexity on producers in the region.

PPSA reiterates the feedback that was provided to Mr David Greenhough, Hills and Fleurieu Landscape Board Chair, on 31 October 2025 regarding the draft Net Zero Strategy for Agriculture.

PPSA strongly supports practical, evidence-based approaches to emissions reduction, however these must be delivered through partnership, not prescription. Climate policy must strengthen – not undermine – the capacity of farmers to produce food and fibre for a growing world population.

PPSA contends that, to advance net-zero ambitions at a regional level, any strategy or regional plan must first be aligned with existing government policy and the whole-of-economy approach to emissions reductions.

Through the NFF, PPSA is actively engaged in climate change policy at national and international levels. The NFF conditionally supports an economy-wide aspiration of net-zero emissions by 2050, provided that:

- There are identifiable and economically viable pathways to net neutrality, including consideration of input costs such as energy;
- Commonwealth and State legislation delivers effective, equitable, and advantageous on-ground programs that benefit agricultural interests and avoid unnecessary regulatory impediments;
- Global and local food security are addressed in conjunction with overarching emissions goals; and
- No sector-specific targets are imposed.

PPSA recommends the removal of references to a sector-specific net zero agriculture emissions target for the region, and instead reframe this measure of success to reducing emissions intensity while maintaining or improving regional productivity.

Emissions reduction initiatives must demonstrably improve farm productivity, soil health, energy efficiency or risk management outcomes. Climate policy that increases input costs, reduces productive capacity or imposes duplicate reporting obligations risks undermining both economic sustainability.

Participation in carbon markets must remain voluntary, commercially viable and supported by clear flexibility mechanisms. Long term-encumbrances on land title, permanence obligations and shifting policy settings create financial and intergenerational risks for producers.

PPSA urges a cautionary approach and whilst there are opportunities arising from carbon farming, the Landscape Board should provide landholders with information to make informed choices to balance the risks.

The case study outlined in the Plan highlights these risks, including issues relating to contract flexibility and detail and high feeds from Carbon Service providers.

C2 Build landscape and community resilience

PPSA supports strategies and actions that improve the resilience of landscapes and communities, provided they are in alignment with state, national and industry approaches.

Resilience initiatives should explicitly recognise the role of productive agriculture as a foundation of regional economic resilience and food security. Improving the productivity of primary production businesses in turn enhances their ability to build the productive capacity of agricultural land, and this goal should be integrated into policy, planning and project development metrics.

Programs and initiatives that address drought preparedness and bushfire risk are particularly important, as increasing climate variability is intensifying both prolonged dry periods and fire frequency, placing significant pressure on farm businesses, natural resources and regional communities. The Plan should prioritise practical, coordinated measures that strengthen on-farm and landscape-scale resilience – including improved water security and storage, soil health initiatives, sustainable groundcover management, weed and pest animal control and fuel reduction and fire break programs that recognise working agricultural landscapes.

Resilience strategies need to align with emergency management planning and support producers through clear guidance, streamlined approvals for recovery works and access to technical and financial assistance.

Strategy 2.5

PPSA seeks clarity is regarding the proposed action to 'mandate climate and biodiversity considerations in agricultural approvals'. Whilst recognising the importance of improved climate resilience and biodiversity outcomes in planning processes, the language of this action creates uncertainty about how it would operate in practice and what types of activities it would apply to. Any measure that introduces additional regulatory layers beyond existing planning, native vegetation and environmental assessment frameworks must be carefully considered to ensure that the additional regulatory burden is proportionate to the risk it is seeking to address. Planning and approval pathways should avoid duplication, delays and unintended barriers to routine farming activities, innovation or adaptation measures – including water infrastructure, diversification or value adding. Any amendments to regulatory approaches must be designed in close collaboration with industry.

Land: Healthy, productive land supporting people, industry and nature

L1 Protect, manage and restore land and soil health

Strong support is given for strategies and actions that support landholders to protect, manage and restore land and soil health. This should be prioritised as core business for the Board.

PPSA encourages the Board to explicitly recognise primary producers as environmental stewards and providers of public goods, including biodiversity habitat, carbon storage, soil protection and landscape connectivity.

PPSA urges the Board to take a practical, risk based and education focussed approach to compliance in relation to soil issues such as erosion during periods of drought. Extended dry conditions, reduced groundcover and extreme weather events can significantly increase erosion risk, often despite producers implementing best practice land management. In these circumstances, a rigid or heavy-handed compliance response is unlikely to achieve improved environmental outcomes and may place additional stress on farm businesses already managing seasonal and financial pressures.

PPSA instead encourages the Board to prioritise early engagement, technical support and services that can assist landholders to implement adaptive soil management strategies suited to variable climatic conditions.

Compliance action should focus on deliverable or negligent practices rather than unavoidable impacts arising from severe drought, and should recognise the constraints producers face when groundcover recovery is dependent on seasonal rainfall.

L2 Future-proof our agriculture

PPSA supports measures to improve the resilience of the agricultural industry, provided they are developed and implemented in close collaboration with industry itself.

Strategy 2.1

There is strong alignment with the priorities of the Landscape Plan and the agricultural industry in relation to the need for stronger land use planning around urban development encroachment and its impact on primary production land and the natural resources contained within.

PPSA emphasises the scarcity of arable land and water resources in South Australia, and the compounding negative impact of urban development to remaining primary production enterprises in the region.

PPSA recommends that the Plan advocate for mandatory agricultural impact assessments in rezoning and development proposals affecting high-value production land. Assessments should consider impacts on water resources, biosecurity risk, land fragmentation, amenity pressures and long-term regional food production capacity.

PPSA would welcome industry being listed as a supporting organisation alongside PIRSA in advocating for the incorporation of agricultural interests in policy land-use planning and development decisions.

Strategy 2.2

As previously indicated, PPSA does not support agricultural sector specific net-zero climate targets.

L3 Reduce the impact of weeds

PPSA strongly supports all measures to reduce the impact of weeds. This should be prioritised as core business for the Board. Weed management must be coordinated across all land tenures – including public land – to equitably share the resource burden and improve long term outcomes.

L4 Reduce the impact of pest animals

PPSA strongly supports all measures to reduce the impact of pest animals. This should be prioritised as core business for the Board. Again, pest animal control must be coordinated across all land tenures – including public land – to equitably share the resource burden and improve long term outcomes.

L5 Reduce the impact of native species where impacts occur

PPSA supports science-based, humane and regionally coordinated management of over-abundant native species. Environmental sustainability and agricultural productivity considerations should be assessed to minimise negative impacts.

Overabundant kangaroo and wallaby populations cause impacts to primary production through grazing of pasture, damage to crops and native vegetation. These impacts are exacerbated during periods of drought when paddock cover is already scarce, and the increased grazing pressure can contribute to poor land management outcomes such as erosion.

Water: Sustainable water management and healthy waterways

PPSA strongly supports this priority and the strategies and actions to achieve it. This should be prioritised as core business for the Board.

We believe that sustainable water management is central to South Australia's environmental integrity and economic prosperity. The security, transparency and consistency of water resource planning directly influence the confidence of primary producers to invest, expand, and innovate. When planning and allocation processes lack certainty or clarity productivity slows, regional economies weaken, and environmental stewardship becomes more difficult to sustain.

PPSA's water policy seeks security and confidence for primary producers to invest in sustainable, profitable primary production, and regional communities. PPSA recognises that there are many co-benefits to agriculture from a healthy environment and water systems and continues to promote these outcomes.

W1 Ensure fair and inclusive access to water

PPSA supports water allocation frameworks that are consistent, equitable and evidence based, and balance the sustainable capacity of water resource to support regional communities, industry and the environment.

PPSA believes that primary producers need secure access to water as an essential resource to underpin sustainable and profitable primary production.

All water allocation frameworks must provide long term secure and affordable access to water for productive purposes, to foster strategic and strong investment in South Australian primary production, supporting vibrant communities, and maintaining a healthy environment.

Clarity is needed regarding the definition of 'fair', as this can be interpreted subjectively and may create uncertainty for water users. Water allocation policies should be grounded in legislated rights and sustainable yield principles. Access to stock and domestic water is an inherent right of all landholders, and PPSA does not support measures to control or reduce access to stock and domestic water.

PPSA takes a strong interest in the review and amendment of Water Allocation Plans (WAPs). We support strong engagement by all stakeholders, including primary producers as an essential foundation to the success of any WAP and to build confidence in policy positions, allocation rationales and frameworks.

PPSA believes that measures to enhance water security are pivotal to underpin the provision of secure and affordable access to water for primary producers to provide business certainty and confidence. Strong support is given to partnership approaches between the Board, DEW, SA Water and Local Government to increase investment in projects that enhance water security measures.

W2 Protect and restore environmental flows

South Australian producers recognise that the health of the environment is intrinsically linked to both water quality and physical access. There are opportunities and co-benefits to agriculture from maintaining the environmental flows in South Australia. Policy approaches must balance environmental objectives with the need for secure and affordable water for productive use.

Surface water and rainwater catchment and storage through dams and tanks are critical measures for addressing water security in the Hills and Fleurieu and improving the resilience of primary producers to variable rainfall.

On farm water storage, when managed effectively can provide a dual role: securing water for production and enabling innovating approaches to environmental water delivery and recharge. Environmental diversion measures such as 'first flush' approaches that divert some rainfall to allow for return to surface water catchments and groundwater recharge are recognised as an appropriate mechanism to balance consumptive use and environmental needs.

PPSA emphasises the need for planning regulation in relation to housing expansion in areas where water resources are already under strain. Urban expansion should not erode the productive capacity of surrounding agricultural enterprises. PPSA supports policy approaches that address the impact of hard surface infrastructure including roads and hard surfaces in housing developments on the water resource availability including surface water flows and groundwater recharge.

W3 Strengthen on-farm water use efficiency

The recent drought has underscored the importance of farm dams as a water security measure for producers. **PPSA supports programs and policy measures that assist producers to improve the**

water use efficiency of dams and utilise technological solutions that provide co-benefits for production and the environment in preference to heavy handed water allocation reductions and water affecting activity compliance activities.

Programs to improve water use efficiency should prioritise and incentivise the voluntary adoption of technology and infrastructure updates rather than relying on regulatory restrictions.

W4 Improve water quality

PPSA supports measures that improve water quality. Water quality must be maintained to ensure that it is fit for purpose and suitable for agricultural, environmental and regional community use. Activities should focus on supporting and incentivising landholders to improve practices and enhance water catchment health.

Nature: Protecting and restoring native ecosystems and wildlife

N1 Retain and protect existing native ecosystems

PPSA supports measures that assist landholders to more effectively manage native vegetation on their land to retain and protect existing native ecosystems. Primary producers play a key role in integrated landscape management that provides critical habitat. Policies and programs must recognise that effective management of remnant vegetation requires ongoing weed management and pest animal control and that these costs can be significant.

N2 Restore and expand native ecosystems at scale

PPSA supports measures to restore native ecosystems. It is recognised that there is benefit in targeted expansion of native ecosystems at scale provided policies and projects carefully consider implications for land use change, water interception, ongoing biosecurity management and regional food production capacity.

PPSA wrote to HF Landscape Board Chair on 7 October 2025 to provide comment on the proposed changes to the Eastern Mount Lofty Ranges Water Allocation Plan relating to Biodiverse Carbon Plantings. PPSA reiterates this feedback as relevant in the delivery of strategies and actions under the Plan relating to broadscale revegetation projects for commercial carbon or biodiversity credits to ensure sufficient oversight, including:

- Landscape board to retain regulatory oversight of plantings and establish a regional register of plantings
- Establish limitations on scale of plantings
- Account for water use by biodiverse carbon plantings
- Undertake improved science on the water use of native plantings to inform environmental water use provisions
- Enhance species diversity requirements

- Landscape board to provide land management support and advice
- Undertake broader stakeholder engagement in relation to policy changes, particularly those relating to water management.

Participation in carbon or biodiversity credit schemes must remain voluntary and commercially viable. Regional policy should not implicitly favour permanent land use conversion away from food production.

N3 Recover threatened species and ecological communities

PPSA recognises the importance of implementing recovery actions and monitoring for threatened flora, fauna an ecological communities. PPSA encourages recovery programs that are co-designed with landholders and industry to integrate agricultural land management with biodiversity outcomes and species conservation.

ENDS.