



## SUBMISSION

7 February 2024

Invasives Species Team  
Department of Climate Change, Energy, the Environment and Water  
By Email: [invasivespecies@dcceew.gov.au](mailto:invasivespecies@dcceew.gov.au)

Dear Committee,

### **Re: Submission to Draft Threat Abatement Plan for Competition and Land Degradation by Unmanaged Goats**

Livestock SA is the peak industry organisation for South Australia's red meat and wool industries. There are over 5,200 sheep producers and more than 2,700 beef cattle producers in the state. With a membership of over 3,500 sheep, beef cattle and goat production businesses, we work to secure a strong and sustainable livestock sector in South Australia.

The red meat and wool industries are the backbone of South Australia's livestock and meat processing sectors, which contribute \$5.4 billion annually to the state.

Livestock SA is a member of Primary Producers SA (PPSA) and is the South Australian representative member of four national peak industry councils: Sheep Producers Australia, WoolProducers Australia, Cattle Australia and Goat Industry Council of Australia. Through PPSA and the Peak Councils, Livestock SA is also a member of the National Farmers' Federation.

Responses to the survey questions outlined in the consultation draft are provided below.

1. Have you referred to and / or used the current (2008) threat abatement plan for competition and land degradation by unmanaged goats?

Livestock SA has found that the Feral Goat Threat Abatement Plan (TAP) 2008 has effectively supported the efforts of private landholders and leaseholders in the effective management of feral goats on their property, in a way that has also facilitated the growth and development of the Australian goat industry (including the harvesting of rangeland goats in South Australia).

In the draft TAP 2023 Introduction (1.1 Threat abatement plans) it states "Mitigating the threat of invasive species is not simply a matter of providing better technical solutions. It also involves understanding and addressing social and economic factors; for example, through supporting the efforts of private landholders and leaseholders to manage goats on their lands for biodiversity conservation and primary production. Research and actions for controlling unmanaged goats therefore need to consider the interests of primary production while still conserving and enhancing ecosystems and native species." However, Livestock SA does not believe that the rest of the draft TAP 2023 adequately reflects the importance of the rangeland goat industry to primary producers

and local communities, or the significant advances made in the sector since the 2008 TAP was developed.

The Australian goat industry provides high quality nutrition and goat meat is recognised for its popularity as a low-fat source of protein, which is high in essential amino acids and iron, providing essential nutrition to people in Australia and across the globe<sup>1</sup>. Australia is the world's largest exporter of goat meat, contributing to the food security of a growing global population. Australian goat meat is exported to Canada, China, Japan, Korea, Taiwan, the United States and Tobago<sup>2</sup>, with rangeland goats making up 90% of Australian goat meat income<sup>2</sup>. 2021-22 exports were valued at \$267.7 million, with expectations of increased demand from overseas markets<sup>3</sup>. If Australia is to maintain its position in the global market, it is vital that producers continue to capitalise on the potential market growth without impediments introduced in a revised TAP.

Industry and Government have invested in the evolution of supply chains for the goat industry and is evolving its production and management tools, demonstrating it is a professional and mature industry. The Goatmeat and Livestock Industry Strategic Plan 2020 evidences the maturity of the industry through the self-driven setting of key performance indicators and critical success factors to support its continued development. The Peak Industry Council: Goat Industry Council of Australia (GICA), has strong ties and collaborative relationships with many government sectors. Some state jurisdictions are investing heavily in goat industry extension staff, displaying the high level of confidence in the goat industry, especially in rangeland and extensive production systems.

Unfortunately, the eradication of rangeland goats is not feasible in the South Australia landscape and the continued strategic harvesting of goats has a vital role to play in managing the impact of feral goats on native vegetation and soils. Furthermore, the harvested rangeland goat industry also provides important employment opportunities to local communities and essential supplementary income for beef, sheep, and crop producers in times of drought and commodity price shortfalls. Producers and landholders are enabled to implement broader environmental and climate change mitigation strategies when they have a reliable income source.

Since the 2008 TAP was introduced, there have been significant changes to the goat industry's operating environment, including the need for greater accountability and credentialing around climate and environmental impact, animal welfare, provenance, and traceability. Livestock SA does not believe that the draft TAP 2023 adequately addresses this.

Livestock SA does not believe that the benefits, progress and emerging challenges and opportunities of the harvested rangeland goat industry have been adequately recognised in the TAP. We ask that this be reviewed and addressed.

Furthermore, Livestock SA is concerned that the TAP 2023 appears to be adopting a 'one size fits all' approach. The reality is that whilst goat eradication may be feasible on an island, it is not feasible in many parts of inaccessible South Australia. We believe that a more tailored regional approach to solutions, with authentic local ownership is required.

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<sup>1</sup> E.C. Webb, Goat meat production, composition, and quality, *Animal Frontiers*, Volume 4, Issue 4, October 2014, Pages 33–37, <https://doi.org/10.2527/af.2014-0031>

<sup>2</sup> DAFF, 2023. Analysis – Australian goat meat makes an impact on the global market. Accessed: <https://www.agriculture.gov.au/about/news/analysis-australian-goat-meat-makes-an-impact-on-the-global-market>, 23/1/24.

<sup>3</sup> Meat and Livestock Australia, May 2023, *Global snapshot: Goatmeat*, MLA Industry Insights, published online [https://www.mla.com.au/globalassets/mla-corporate/prices--markets/documents/trends--analysis/goat-industry-summary/2023-mla-ms\\_global-goatmeat\\_f5.pdf](https://www.mla.com.au/globalassets/mla-corporate/prices--markets/documents/trends--analysis/goat-industry-summary/2023-mla-ms_global-goatmeat_f5.pdf) (Accessed 12 January 2024).

2. Do you support the objectives and actions listed in the draft threat abatement plan (2023)?

No.

3. Do you have any specific comments on or additional ideas for the objectives and actions outlined in the draft threat abatement plan for unmanaged goats?

Livestock SA does not support the current draft threat abatement plan for unmanaged goats and has serious concerns regarding some objectives and their potential impact on the harvested rangeland goat industry.

Livestock SA supports Objectives 1-3, 6 and 8 and supporting actions. However, we believe that changes are needed under Objectives 4,5 and 7.

**Action 4.5** proposes the trialling of baits and feeders for unmanaged goats. Livestock SA has significant concerns over this inclusion as a feasible option. We question the level of consultation with landholders (including cattle and sheep producers and the rangeland goat industry), given the significant risks posed by baits to non-target species (including wildlife and domestic animals), as well as the global reputation of our harvested goat industry. A bait targeting goats will likely affect domestic ruminant species such as cattle and sheep, and in farming regions such as the SA pastoral zone, off-target baiting of these species is a serious risk.

Current methods of reducing unmanaged rangeland goats by the industry are a safe, humane viable and profitable option. Any use of baits to control unmanaged goats will significantly damage this industry and its reputation for supplying safe meat to international markets. Baits will also result in poor animal welfare outcomes for goats, other domestic animals, and ruminants, potentially damaging the sheep and cattle industries. It will also lead to poor animal welfare and negative impacts on native wildlife species impacted by off target baiting. Due to these significant risks of using baits, they must not be considered as a management option under the TAP.

**Actions 4.8 and 4.9** - the proposal to use dingoes as a control method for unmanaged rangeland goats.

The South Australian Sheep Industry Blueprint 2030 identifies the goal to eradicate wild dogs from inside the dog fence<sup>4</sup>, and Livestock SA does not support allowing dingoes in this area, even for the control of unmanaged rangeland goats. The known negative impact of wild dogs and dingoes inside the dog fence on the sheep industry and producers will far outweigh any positives secured in unmanaged rangeland goat control should this approach be implemented.

Stock losses from wild dogs and dingoes in these regions can be significant. In 2018, an estimated 20,000 sheep were killed by wild dogs with an associated annual loss of \$4 million<sup>5</sup>. This is exacerbated still further by the spread of diseases from dogs to livestock<sup>6</sup> (e.g. hydatids).

The use of dingoes as a control method poses a major animal welfare risk to unmanaged rangeland goats (and our industry's reputation in the global market). The risks posed by dingoes to goats are unacceptable when the current harvesting of unmanaged rangeland goats is a humane, profitable industry that also results in the use of the animal for human nutrition.

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<sup>4</sup> The South Australian Sheep Industry Blueprint 2030

<sup>5</sup> Legge, S., Taggart, P.L., Dickman, C.R., Read, J.L. and Woinarski, J.C.Z (2020) Cat-dependent diseases cost Australia AU\$6 billion per year through impacts on human health and livestock production, *Wildlife Research* 47 (8), 731-746

<sup>6</sup> Jenkins, D.J., Urwin, N.A.R., Williams, T.M., Mitchell, K.L., Lievaart, J.L. and Armua-Fernandez (2014) *International Journal for Parasitology: Parasites and Wildlife* (3), 75-78

The cost of managing wild dogs (and dingoes) to the livestock industry are significant - an estimated \$64 - \$111 million annually across Australia<sup>7</sup>. The associated reduced ability of producers to run livestock in areas with higher dingo numbers also impacts the financial stability of producers and regional communities<sup>4</sup>. Producers affected by stock losses from dingoes report emotional impacts such as anxiety, stress, and sleeplessness<sup>8</sup>, all of which impact relationships at personal, business and community levels. Using dingoes in areas with livestock to control goats will exacerbate these effects and Livestock SA believes this is unacceptable.

Historic research demonstrating that dingoes can control the impacts of feral cats has since been proven to be unreliable, with only a handful of studies found to be capable of correctly and robustly assessing the evidence of dingoes as a cat control method. No evidence was found of suppression of mesopredators (such as feral cats) by dingoes<sup>6</sup>. Therefore, it is highly unlikely they will be effective in the control of unmanaged goats.

**Activity 5.2** – The effective management of goats through harvesting is a sustainable method of controlling numbers and producers undertaking this work on their properties will also be able to demonstrate associated soil and vegetation health benefits, impacting carbon levels. Livestock SA supports the inclusion of the suggested ‘Biodiversity Certificate’ to recognise the work by producers in environmental stewardship and net carbon emission reduction through management of goat populations. However, for ease of administration, we urge that this Certificate align with existing credentials in preference to being stand alone.

**Objective 7** does not adequately detail the importance, maturity and growth of the harvested rangeland industry, nor does it consider how the plan will impact this industry going forwards, as well as the communities it supports along the value chain. This industry plays a key role in controlling numbers of unmanaged rangeland goats, including in regions of South Australia, where management and control of goats can be difficult due to remoteness and terrain.

The South Australian harvested rangeland goat industry effectively removes unmanaged goats from the landscape in a humane manner and provides a quality product sought after in the global market. To achieve this, the industry has invested significantly into infrastructure, including goat depots. Depots are an important component to the function of the industry and require careful management to meet biosecurity, food safety and product integrity requirements. To maintain momentum and secure future investment by industry, the TAP should also recognise the important progress and investment to date. Consultation with producers, landholders and others along the value chain must also be ongoing to ensure this industry can continue to contribute to the management of unmanaged rangeland goats in areas such as South Australia, where other management options are not feasible.

The harvested rangeland goat industry has a proven track record in managing rangeland goat impacts on the environment through the removal of these animals, even when they received low prices. This demonstrates how seriously the harvest rangeland goat industry is about their role in protecting the environment from the impacts of unmanaged goats, even at times when it is not highly profitable to them. Therefore, this industry must be valued and supported as a vital tool in the effective removal of unmanaged rangeland goats under the TAP.

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<sup>7</sup> NSW Natural Resources Commission, Cost of Pest Animals in NSW, and Australia 2013-14).

<sup>8</sup> Government of South Australia (2023) South Australian Wild Dog Management Strategy

4. Do you see a role for yourself / your organisation in contributing to the objectives and actions of the draft threat abatement plan for unmanaged goats?

Livestock SA is the representative body for beef cattle, sheep, and goat producers in South Australia, with over 3,500 members across the state. As the representative body for goat producers, Livestock SA plays an important role as a conduit between SA goat farmers and TAP developers. We can also assist with the distribution of information and the implementation of the plan.

Livestock SA is a member of the National peak industry body for goats – the Goat Industry Council of Australia (GICA) with representation from Livestock SA providing input to GICA for South Australian producers. Livestock SA can play an important role in assisting GICA in communicating to South Australian goat producers and provide feedback on the TAP at a regional and state-based level to GICA to communicate at a national level.

Livestock SA can also provide advice to the state government on the management of goats in regions across SA and with the support of state government, continue to assist in the growth of the unmanaged harvested rangeland goat industry in South Australia.

Livestock SA can also assist in actions outlined under Objective 5, particularly around advice on carbon farming incentives and land management. Livestock SA is actively engaged in the carbon farming space and aims to provide producers with access to the most current advice on land management and carbon farming, guided by the work of the South Australian Sheep and Beef Industry Blueprint initiatives<sup>8</sup>.

5. Do you have any ideas or suggestions for ways to mobilise stakeholder engagement and action in implementing the draft threat abatement plan for unmanaged goats?

The level of engagement by TAP developers to date with the harvested rangeland goat industry is unclear. We strongly advise more thorough consultation across regions with landholders and others along the goat value chain. Management will differ based on the region and its own unique challenges and opportunities and the TAP 2023 must account for this. For example, total eradication has proven possible on islands such as Kangaroo Island but is completely unrealistic in other regions of South Australia where alternative options must be employed to best manage numbers. Regional consultation should include producers and producer groups such as farming systems groups and landscape management boards for each region. Local knowledge will be key to effective management, and local opinions must be heard.

Further consultation and engagement with industry at all levels must also be undertaken before any implementation of a revised TAP for unmanaged goats. There are several objectives currently included in the TAP that we do not support (including the use of baits and dingoes as control methods) and believe further consultation with industry is needed on these proposals. This includes consultation with state farming organisations such as Livestock SA, but also national bodies such as GICA and Meat and Livestock Australia who contribute to research, development and adoption in the goat industry.

6. Are there any specific amendments you would like to suggest we consider making to the draft threat abatement plan for unmanaged goats?

The TAP should be amended to acknowledge the importance of the harvested rangeland goat industry and the positive impacts of the industry in humanely reducing goat numbers and the associated environmental impacts, providing value to Australian exports, providing a high-quality

nutritional product and income to regional communities. This industry continues to mature and invest in effectively managed goats without waste and this work must be recognised in the TAP.

There are also several objectives where landholders, producers and the unmanaged rangeland goat industry are not included, and we believe this should be amended. This includes objectives 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 5.1, 5.2, 5.6, 6.3, 6.4, 6.6, 7.1,7.2, 7.3,7.4, 7.5, 8.1 and 8.3.

Recognition of the difference between regions and the effectiveness of management options in different areas should be included more clearly. Unmanaged goats are located across Australia in different environments and circumstances and can only be managed effectively with sound knowledge and plans for each region. Local knowledge must be a clear feature of the TAP.

Research is needed to inform a holistic and effective TAP – the current draft TAP refers to a lot of research that is required to prove the assumptions. Assumptions are not data and cannot be translated into ground control methods. With more research and proven data, it may be revealed that no TAP is required in the harvested rangeland areas of Australia, with only monitoring and proactive mustering activities and humane removal activities on government-owned lands and isolated islands/areas within specifically identified fragile ecosystems.

Additionally, areas outside the harvested rangelands have not contributed to Australia’s goat industry to the same degree as producers west of the Great Dividing Range. Livestock SA supports the suggestion that the draft TAP be amended to primarily focus on management options for feral goats in non-rangeland areas (e.g., offshore islands within the Great Barrier Reef World Heritage Area) which have been identified as an area that should be a priority for control and eradication programs. This amendment would work to further the intended goal of reducing the impact of feral goats on biodiversity and cultural values.

The TAP must also be amended to address the unintended consequences the draft currently creates, including the potential baiting of non-target species, the increase in wild dog numbers in pastoral areas and the currently successful operations of the harvested rangeland goat industry.

The current draft TAP fails to holistically consider activities, investments and commitments made by other Government agencies including, NSW Department of Primary Industries, the Department of Agriculture, Fisheries and Forestry, CSIRO and co-funded research through Meat and Livestock Australia in supporting the goat industry growth and development, and specifically harvested rangeland goat operations. Amendments should be made to ensure these valuable and beneficial relationships that contribute to feral goat abatement are not compromised.

Finally, legislation related to the control of unmanaged rangeland goats must be as simplified as much as possible to enable the on groundwork of land managers and producers to reduce numbers. Reviews of state and federal legislation and alignment and simplification of legislation where possible will prove beneficial to effective management of rangeland goats and reduce hurdles where they may exist currently.

#### 7. Do you have any feedback to provide on the background document?

Goat meat industry (Pages 8 – 9)

- This section primarily focuses on “opportunistic goat harvesting” and fails to recognise that harvested rangelands goats are a viable, growing, and successful business model for landholders in the rangeland regions that is not based on “opportunistic” events.
- The industry’s contributions to rural and regional economies and communities including employment opportunities are not recognised nor outlined within this section. It is remiss to

not fully outline the economic benefits the goat meat industry provides, along with the indigenous employment opportunities currently seen.

- This section fails to recognise that the goat meat industry is a mature industry investing in RD&E activities. Furthermore, it does not recognise the role government agencies continue to have in supporting this industry.
- This section does not outline the goat meat industry production demographics for Australia-SA.
- The goat meat industry continues mature growth in managed-goat populations albeit commentary that managed-goat populations has “gained some traction” in the rangelands of NSW and Queensland. This does not accurately reflect the nature of this evolving industry.

#### 2.1 Mustering (Page 11)

- Many other factors such as seasonal conditions and difficult terrain may contribute to increased goat populations, and it is remiss to insinuate that landholders will not remove all goats from their local areas purely for their own financial gain. This section ignores the environmental benefits harvesting rangeland goats contribute to conservation outcomes.

#### 2.4 Culling (Page 14)

- Landholders who work in and contribute to the goat meat industry view goats as a valuable commodity and not a pest. Thus, commentary made that the culling of goats has lower support due to a perception of a “wasted resource” does not accurately reflect their status. This language defining goats as a resource (further seen in 3.2 Cultural issues (Page 19)) does not accurately recognise the importance goats play in Australian agriculture.

#### 2.6 New monitoring and control techniques (Pages 15- 16)

- Whilst a prototype for a goat specific toxic bait delivery has been developed, the absence of an appropriate registered toxin for goat control raises numerous concerns. All baiting must adhere to scientifically tested standards and procedures and until this has been achieved, baiting is a problematic control technique for feral goats. Livestock SA is concerned that this technology will not eliminate all risks of baiting to non-target species.

#### 2.7 Acceptability of control methods and animal welfare considerations (Pages 16 -17)

- The draft background document omits the risks associated with using dingoes as a control method and the extensive impacts the introduction of this apex predator would have to the environment. More information is required on the risks associated with this control method, the impacts of introducing dingoes into environmental ecosystems where they are not located, and potential human and animal welfare and health impacts if not confined within designated locations. The draft background document further omits any information on RD&E and stakeholder investments into reducing dingo (and/or wild dog populations) through the wild dog fences that mitigate against pest animal and biosecurity threats.

#### 3.2 Cultural issues (Pages 19 – 20)

- The statement “The sale of the goats provides only a small income after covering transport and mustering costs” diminishes the value the harvested rangeland goat meat industry contributes to Australia’s economy and communities underpinned by this industry. Recognition must be given to value of the goat meat industry and the fact that Australia is the world’s largest exporter goat meat, and free trade agreements support entry of Australian goat meat into several key international markets. In 2021-22, exports peaked at a total value of A\$296.7 million. It also fails to recognize when the mustering of wild goats provides invaluable income to producers experiencing drought.

8. Rate your overall impression of the draft threat abatement plan for unmanaged goats.

	Excellent	Good	Fair	Poor	Very poor	N/A
Comprehensiveness				X		
Usefulness				X		
Ambition			X			

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

Yours sincerely,

Travis Tobin  
Chief Executive Officer