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Ms Robyn Denholm
Chair, Strategic Examination of R&D Independent Panel
Department of Industry, Science and Resources
Canberra, ACT 2600

Via - https://consult.industry.gov.au/strategic-examination-rd-discussion-paper/submission-extension

Dear Ms Denholm,

Re: Australian Dairy Farmers submission to the Strategic Examination of R&D

Australian Dairy Farmers (ADF) welcomes the opportunity to contribute to the Strategic Examination of Australia's research and development (R&D) system.

Dairy is the third largest Australian rural industry and a key sector of the agricultural economy, with a farmgate value of $6.2 billion and a direct workforce of almost 31,300 across dairy farms and processing. Australia is a significant exporter of dairy products. In 2023/24, 32% of milk production was exported, worth around $3.6 billion. It ranks fifth in terms of world dairy trade, with a five per cent market share behind New Zealand, the European Union, United Kingdom, and the United States.

Australian Dairy Farmers (ADF) is the national peak industry representative body (IRB) representing Australia's dairy farm businesses. Our members invest significantly in research, development and extension (RD&E) through the statutory dairy service levy – equating to approximately $60–70 million annually when combined with matching contributions from the Commonwealth Government. This investment reflects the industry's strong commitment to innovation and continuous improvement.

ADF and our members are fundamentally supportive of the principles underpinning Australia's RD&E framework, and we recognise the importance of ongoing investment to drive on-farm productivity, sustainability and profitability. Specifically:

- ADF support sustained investment in RD&E as a critical lever for productivity growth, competitiveness, and resilience in a globally exposed industry.
- ADF are supportive of the individual Research Development Corporation (RDC) model, recognising it as a uniquely Australian structure that fosters long-term industry-government collaboration.
- ADF supports the co-investment model underpinning Australia's RD&E funding arrangements – particularly the capacity for producers to directly shape R&D

priorities through levies, matched by public investment to deliver broader economic and community benefits.

- ADF believes there is always room for improvement in the performance and alignment of RD&E investments, particularly in ensuring they deliver tangible, measurable outcomes at the farm gate.

This submission is therefore provided with a desire to ensure the RD&E system works better for the farmers who fund and rely upon it. It reflects how most members engage with Australia's RD&E framework, through our members' lived experiences with agricultural RDCs, and primarily Dairy Australia.

ADF has identified practical reforms that can increase the value, transparency and accountability of investments, and to highlight where ADF and the wider farming community can play a more active role in ensuring RD&E priorities reflect industry needs. It hopefully adds perspective to the discussion papers comment 'much of this research rarely addresses the needs of the main users of research and innovation in Australia – industry, government and the community".

We also acknowledge that our related RD&E system through Dairy Australia has delivered value in many areas, such as climate and animal welfare innovation, and has produced many significant documents and systems that have supported farmers and continue to support farmers particularly with issues such as legislative compliance (for example the National Feedpad & Contained Housing Guidelines). These do not automatically translate to increased productivity but do have the effect of creating business certainty in an increasingly challenging regulatory environment.

Unfortunately competing RD&E priorities have impacted farm-level productivity and profitability, which has not kept pace with the scale of investment—this gap must be closed if we are to ensure the long-term viability and growth of Australia's dairy sector. In that context, ADF proposes the following key areas for improvement and collaboration:

Strategic Opportunities Summary

1. RD&E as a tool for regulatory evidence and enablement, funds are increasingly used to support compliance and adaptation, diverting focus and funding away from productivity-enhancing innovation.

2. Introduce mandatory, independent post-project evaluation of RD&E programs to ensure investments deliver measurable on-farm benefits.

3. Strengthen the Statutory Funding Agreement (SFA) to include clearer, quantifiable performance indicators tied to farm-level outcomes and reviewed mid-term.

4. Enhance governance by expanding farmer-led oversight and deepening engagement in RD&E priority setting and impact assessment.

5. Rebalance RD&E priorities toward economic outcomes, focusing on cost-efficiency, productivity, and whole-of-farm profitability.

6. **Reinvest in regional extension capacity**, working with ADF, state-based organisations and other delivery partners to improve adoption pathways.

ADF believe that these enhancements will not only strengthen the performance of the RD&E system but also ensure greater value for levy payers, like dairy farmers, while maximising the value of existing investment in R&D, across government, and industry.

We submit that fundamental changes are required in how RD&E is prioritised, delivered, and governed to restore growth, productivity and competitiveness, especially to the dairy industry.

The dairy sector faces significant challenges – from climate variability to global competition – that demand a highly effective RD&E system delivering innovation and productivity growth on farm.

Over the past 25 years, Australia's dairy industry has been in persistent contraction – national milk supply has declined steadily since 2000 after a prior era of growth. This prolonged decline reflects chronically low farm profitability, indicating that the RD&E system has not delivered the level of improvements needed to sustain farmer confidence and investment. Indeed, even in recent years of high farmgate milk prices, milk output continued to trend down or remain flat[1].

Delivery of On-Farm Productivity and Profitability Gains (Dairy Farm Example)

Despite significant industry-funded RD&E efforts, evidence reviewed by ADF indicates that RD&E, at present, is not sufficiently fulfilling its intended mission for a significant proportion of farmers. Analysis confirms that total factor productivity on Australian dairy farms has been essentially flat – the ABARES Dairy Industry Productivity Data shows productivity over 2012-13 to 2023 to be only ~0.1% with average growth rates at -1.2% for outputs and -1.2% for inputs[2].

There was no detectable technological progress in this period and even a slight decline in technical efficiency on farms, meaning farmers on average are not producing more output per unit of input than they were ten years ago[3]. In short, current data suggests innovation is largely not translating into significant productivity gains for many Australian dairy farms[4].

Recent temporary boosts in farm profits have been driven by improved milk prices (terms of trade), not by R&D-driven efficiency – a reality acknowledged in the recent Marsden

[1] Australian Dairy Farmers (internal paper). (2024). Discussion paper on long-term milk production decline and questions RD&E impact on farm profitability.
[2] ABARES Productivity Dashboard accessed 17.4.25 https://www.agriculture.gov.au/abares/research-topics/productivity/agricultural-productivity-estimates
[3] ABARES Productivity Dashboard accessed 17.4.25 https://www.agriculture.gov.au/abares/research-topics/productivity/agricultural-productivity-estimates.
[4] Marsden Jacob Associates. (2022). Dairy Productivity – Final Report. Commissioned by Dairy Australia. Retrieved from marsdenjacob.com.au

Jacobs Dairy Industry Competitiveness Study report[5].

The report found that this recent farm profit growth has come "on the back of favourable terms of trade driven by higher prices," with "productivity gains only having a minor impact on profitability"[5]. In other words, most of the improvement in farm incomes has been due to higher milk prices rather than efficiency gains. The competitiveness study noted that this represents a missed opportunity, as productivity gains are critical for profitability and are something industry and government can directly influence [6].

In 2023–24, 90% of dairy farms achieved the RDC's profit target for the first time (exceeding the target of 50% of farms) due largely to record milk price[7], whereas in more typical years well under half of farms reach sustainable profit levels. This underscores findings that underlying farm profitability remains weak when market conditions are less favourable.

Notably, the data show that simply scaling up farm operations or adopting new technologies has not translated into the expected efficiency gains. The Marsden Jacobs report observed that both technological change and farm scale contributions to productivity "have been flat despite large investments in technology and the increasing scale of farms"[6]. It is telling that even in fundamental areas like pasture and feed innovation – traditionally key R&D focus areas – progress has been sluggish. For instance, industry consultations identified "insufficient progress in some R&D areas – such as genetic gain in new pasture and forage varieties", suggesting that advances in core farm inputs are not keeping pace with needs.

The failure to convert R&D investment into on-farm progress can be traced in part to misalignment of R&D priorities with economic outcomes. Too much on-farm R&D has focused on regulatory compliance and adaptation, or technical aspects of production that *increase* costs or complexity without delivering commensurate financial returns to farmers. For example, industry programs have long encouraged year-round "flat" milk production to maximize processor factory throughput, requiring higher-cost feed systems – but evidence shows the cost to farmers is 2–3 times greater than the savings for processors. Many such initiatives emphasising cow output or management intensity have increased farmers' cost of production without improving profitability[8].

By contrast, relatively less emphasis has been placed on projects targeting economic efficiency – i.e. improving farmers' margin per litre through cost reduction, labour productivity, and risk management. Farmers rely on the expert advice of the RDC to identify which innovations will truly improve profit and productivity[9].

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[5] Marsden Jacob Associates et al. (2025). Dairy Industry Competitiveness Study – Final Report. Prepared for Dairy Australia (Jan 2025)

[6] Marsden Jacob Associates et al. (2025). Dairy Industry Competitiveness Study – Final Report. Prepared for Dairy Australia (Jan 2025).

[7] Dairy Farm Monitor Annual Report -2023/24 p.5

[8] Australian Dairy Farmers (internal paper). (2024). Discussion paper on long-term milk production decline and questions RD&E impact on farm profitability.

[9] Australian Dairy Farmers (internal paper). (2024). Discussion paper on long-term milk production decline and questions RD&E impact on farm profitability.

For example, there may be opportunity to improve productivity and profitability with a shift in RDC focus from a production/volume focus to a farm margin/profitability focus. For example, 2020–21 to 2022–23 the largest 10% of dairy farms accounted for almost 35% of all dairy output and earned them a rate of return of 14.5%, whereas the smallest 10% of farms accounted for only 1.2% of output and earned a much lower rate of return at 7.7%[10].

In areas of investment – from feed base and herd genetics to new technology – the absence of industry-wide productivity improvement suggests a serious gap in the effectiveness of RD&E programs in delivering tangible value for levy payers. ADF's own review has concluded that, for a range of reasons, R&D at present is not effectively fulfilling its mission to help farmers become consistently profitable and competitive[11].

While important work has been done in areas like animal welfare, environment, and marketing, these contributions cannot secure the industry's future in the absence of profitability. **The RD&E system in the dairy sector needs to shift focus to on-farm productivity and profitability to halt the decline in Australian dairy production.**

Adoption and Extension of Innovations

ADF acknowledges that the impact of R&D is ultimately mediated by adoption on farm – and here the system is also falling short. Dairy Australia's mandate includes extension – the "E" in RD&E – yet many farmers experience a gap between research outputs and on-farm adoption. Even where useful innovations or practices exist, too few dairy farmers are aware of them, convinced of their value, or capable of implementing them. The Marsden Jacob's report highlighted a lack of awareness among many farmers about the value of R&D and new practices[12]. This points to weaknesses in extension and technology transfer.

Industry consultation has identified multiple adoption barriers: insufficient regional adaptation of R&D (farmers often struggle to apply generic research findings to their local conditions), long lag times before R&D outputs are made farm-ready, and a shortage of on-ground service providers to support farmers with implementation[13].

Notably, **the Marsden Jacob's report found that there are gaps in agricultural extension services, with not enough independent advisors or agronomists available to help dairy farmers implement new technologies and practices[14].** The traditional government agricultural extension capacity has diminished over time, and regional development programs are not resourced to fill this void at the necessary scale. The result is a greater need for more investment in extension.

Furthermore, research is often not sufficiently tailored to the diverse regional conditions across Australia's dairy regions. The industry consultations found that R&D needs to be

[10] ABARES Dairy Farm Performance - Disaggregating farm performance statistics by size accessed 17.4.25 https://www.agriculture.gov.au/abares/research-topics/surveys/disaggregating-farm-size
[11] Australian Dairy Farmers (internal paper). (2024). Discussion paper on long-term milk production decline and questions RD&E impact on farm profitability.
[12] Dairy Australia (2024). Performance Report 2023–24. Dairy Australia Ltd.
[13] Dairy Australia (2024). Performance Report 2023–24. Dairy Australia Ltd.
[14] Marsden Jacob Associates et al. (2025). Dairy Industry Competitiveness Study – Final Report. Prepared for Dairy Australia (Jan 2025)

more regionally specific, with current efforts leaving "gaps in understanding of how R&D can be applied regionally to meet diverse needs". A one-size-fits-all approach means that an innovation developed for, say, a temperate irrigated system in Victoria may not be readily applicable to a subtropical pasture system in Queensland.

Dairy Australia's own metrics show some improvements – e.g. increasing use of decision tools like the Forage Value Index – but many key practice change targets (such as nutrient management or risk planning) remain unmet, with less than half of farmers adopting recommended practices in some areas[15].

The extension pipeline is restricted: from limited farmer engagement in R&D priority-setting, to inadequate on-farm support for practice change, to external hurdles, there are systemic challenges preventing R&D outputs from being widely adopted on Australian farms. Farmers often do not see clear, credible evidence of the benefits of new practices in improving their bottom line, which feeds a cycle of low adoption and low impact. For the RD&E system to succeed, these barriers must be addressed with a reinvigorated focus on effective extension and incentives for on-farm innovation uptake.

What is also being seen is the use of levy funds and farmer intellectual property for the development and establishment of products or innovations by commercial entities, who then make farmers pay for these products (or subscriptions). Therse returns and profit then flow to that commercial operator and not to or for the benefit of farmers of industry. This pay for use model, after levy investment, is a significant barrier to adoption and utilisation. RDC's should be wary of using levy funds for entities or products that would be otherwise provided by the commercial sector.

This low utilisation is symptomatic of a broader issue – many levy-funded initiatives do not effectively reach farmers. Whether due to cost, lack of awareness, perceived irrelevance, complexity, or other reasons, the result is the same: **a disconnect between what is developed and what is adopted**. This gap between RD&E outputs and on-farm practice change underscores the need to rethink how extension is executed in the RD&E industry. Robust extension and user-friendly, regionally relevant programs are essential to turn R&D into real-world outcomes. Without them, even the best research will have little impact.

Governance and Accountability in RD&E.

The shortcomings above point to governance issues in how RD&E is managed. Dairy Australia, as the industry's RDC, receives around $60–70 million annually of farmers' levy funds and taxpayer matching funds [16]. It is incumbent on governance structures – its Board oversight, strategy, and management – to ensure this investment delivers results for levy payers. However, the variability in industry performance indicates a **disconnect between activities and actual industry outcomes**. There is mounting concern among farmers that governance does not sufficiently prioritise measurable economic returns. For example, numerous high-level goals and KPIs are outlined in the strategic RD&E plan, but many

[15] Dairy Australia (2024). Performance Report 2023–24. Dairy Australia Ltd. – Provides Dairy Australia's self-assessment of progress against strategic targets.
[16] Dairy Australia (2024). Performance Report 2023–24. Dairy Australia Ltd. – Provides Dairy Australia's self-assessment of progress against strategic targets.

focus on outputs (numbers of projects, of workshops held, number of toolkits distributed people trained, services delivered) or intermediate outcomes (awareness, intentions) rather than ultimate farm performance metrics.

There is also a perceived lack of rigorous evaluation of programs – too few independent, post evaluations are conducted and published to determine which investments delivered value and which did not. While reports of benefit-cost ratios are made for some programs in annual evaluation reports, these are often based on modelled or expected benefits. What is missing is a transparent accounting of actual industry impact over time, and a willingness to redirect or cease initiatives that are not achieving impact.

There is no regular public reporting that says, "This project cost $X and yielded $Y in benefits to farmers in terms of increased production or reduced costs." As levy payers funding these projects, dairy farmers deserve a clear accounting of outcomes.

We acknowledge that Dairy Australia reviews its project portfolio annually and consults stakeholders on priorities. However, this process is largely internal, and any independent verification is not widely publicised. Without independent, transparent economic and technical analytical assessment of RD&E outcomes, there is a risk of overstating success or overlooking shortcomings. In a well-governed R&D system, an external evaluation mechanism would scrutinise performance objectively, ensuring accountability and transparency for the tens of millions in levy dollars at work.

Furthermore, accountability to its core stakeholders (dairy farmers) appears limited in practice. Formal mechanisms exist (levy payers can vote on constitutional resolutions and the Board, IRBs and state dairy bodies engage as key stakeholders), yet farmers often voice frustration that their productivity and profitability needs are not being met. A skills-based and independent board is important for good governance, but it must also be squarely accountable for delivering on the industry's growth and profit objectives. There is an opportunity for current governance arrangements to more effectively support efforts to enhance Australia's international competitiveness and market share. This indicates a **need for stronger external oversight and performance accountability**.

This lack of granular, outcome-oriented metrics was implicitly highlighted in the Marsden Jacob report engagement findings. Stakeholders voiced concern that R&D spending "has not always been utilised effectively and productivity gains are not as forthcoming from those changes as might have been hoped"[17]. In their view, a siloed approach sometimes occurs, where research looks at a niche issue in isolation *"without understanding how it impacts the whole business"*. Such frank feedback from farmers and consultants indicates a misalignment between what RD&E is delivering and what farmers consider meaningful progress.

Another governance limitation is the **lack of independent scrutiny and input at the decision-making level**. Boards and management oversee RD&E priority setting and funding allocation. While industry consultation occurs, ultimate decisions and subsequent

[17] Marsden Jacob Associates et al. (2025). Dairy Industry Competitiveness Study – Final Report. Prepared for Dairy Australia (Jan 2025)

evaluations stay in-house. This can lead to a culture of defensiveness or complacency, where programs may persist due to established processes rather than demonstrable ongoing benefit. International best practice in agricultural R&D would suggest having independent experts or reviewers involved to assess program impact and recommend redirection of effort if needed.

We see a need for more independent voices in R&D governance, as well as a closer involvement of farmer representatives in holding the corporation accountable. Dairy farmers fund RD&E; it is only fair that they, through IRBs (bodies like ADF) and others, have greater oversight into how effectively that money is spent. Currently, the avenues for such oversight are limited. The government's five-yearly performance reviews of RDCs and the annual reports to Parliament are useful, but they are high-level. They do not substitute for continuous, independent, transparent and granular accountability.

The Statutory Funding Agreement – a Performance Safeguard

The primary governance instrument between RDC's and the Commonwealth is the Statutory Funding Agreement (SFA) – most recently renewed for dairy in 2025–2034. The SFA sets out broad expectations and obligations, including compliance with the government's five Performance Principles (stakeholder engagement, effective RD&E, collaboration, good governance, and monitoring & evaluation)[18]. While the SFA establishes a framework for performance, in ADF's view it **does not provide sufficient teeth to ensure real accountability or continuous improvement**.

The SFA's requirements (such as annual reports, independent audits, and performance reviews at intervals) tend to emphasise processes and inputs rather than concrete targets or measures for industry outcomes. For instance, an RDC can be fully compliant with the SFA by delivering strategies, consultations, and reports, yet still fail to achieve any improvement in on-farm metrics.

The **accountability and review provisions lack consequences**: if performance is sub-par – e.g. flat productivity over a decade – there is no trigger for remedial action other than the next five-year independent performance review. Those reviews, while useful, have historically resulted in only incremental recommendations. There is no mandate in the SFA for independent ex-post evaluations of individual programs to rigorously assess impact, nor any requirement to publicly report clear, quantifiable impact measures linked to its investments (beyond high-level benefit-cost estimates it publishes). In short, the governance mechanism is not driving performance to the extent needed.

SFA's should be strengthened to include enforceable performance milestones and a sharper focus on outcomes for the benefit of levy paying farmers. Levy payers should be able to expect that if tens of millions are invested in RD&E, there will be demonstrable progress in farm productivity, profitability or other agreed impact metrics – and these should be reported plainly. If those impacts are not achieved, the governance framework should facilitate changes in strategy or personnel.

[18] Commonwealth of Australia & Dairy Australia (2024). *Statutory Funding Agreement 2025–2034 (Dairy Australia)*.

At present, accountability is too diffuse: it is accountable to many stakeholders in theory, including government who provides matching funding, but in practice to none for delivering bottom-line results. The SFA as it stands has proven insufficient to prevent or correct systemic under-performance in RD&E delivery [19]. Stronger governance levers are needed to align RD&E focus with the economic interests of farmers who fund it.

Strategic Recommendations

Panel should consider the following reforms, which we believe are critical to recalibrating the RD&E system for success:

1. R&D as a tool for regulatory evidence and enablement:
   A growing share of levy-funded R&D investment has been directed towards ensuring legislative compliance and managing regulatory change – including the development of technical standards, environmental compliance tools, and animal welfare guidelines. This growing regulatory focus is not a reflection of poor priority-setting by RDC's – rather, it reflects a broader structural challenge in the policy environment. The current operating environment requires a more deliberate focus on R&D as a tool for regulatory enablement. This would unlock greater returns from existing investments and ensure that compliance-driven research also serves to advance farm productivity.

2. Introduce Mandatory Independent Post Evaluation of RD&E Investments:
   We recommend that all major R&D programs and projects undergo independent economic and technical impact evaluation after a suitable interval post-implementation. This should be a requirement under the SFA or associated performance framework. Robust, third-party evaluations would determine the actual on-farm outcomes (productivity, profitability, adoption rates) attributable to each investment. Learnings from these evaluations must feed back into funding decisions. Programs that do not deliver tangible benefits should be re-scoped or terminated. This will instil a culture of evidence-based accountability and continuous improvement.

3. Strengthen the Statutory Funding Agreement with Measurable Impact Reporting:
   The SFA should be reformed to include specific, measurable indicators of industry impact that must be monitored and reported against biannually – for example, industry-average cost of production, (e.g. net operating cost per kilogram of milk), percentage of farmers achieving certain profit benchmarks, rate of adoption of key practices, etc. These should align with the industry's strategic goals (like improving farm profitability and growth). Performance against these outcome indicators should be formally reviewed at least quarterly through the SFA term by an external panel, with findings made public. The SFA should also clarify consequences or required actions if performance is falling short. Tightening the SFA in this manner will shift the focus from mere compliance to delivering results that matter to farmers.

[19] Australian Dairy Farmers (internal paper). (2024). Discussion paper on long-term milk production decline and questions RD&E impact on farm profitability.

4. Governance Reform:
   To ensure strategy and culture are firmly oriented toward farmer economic returns, governance reforms are needed. A review of board composition and performance oversight processes is necessary. This could include establishing a stronger farmer advisory council or enlarging the role of IRBs (like ADF) and other farmer representatives in setting RD&E priorities and evaluating outcomes. Consideration should be given to requiring that a subset of Board directors are directly accountable to levy payers and metrics under the SFA. Improved transparency of decision-making is also crucial – farmers must clearly see how and why investment decisions are made, and how those decisions track back to farm-level benefit. Ultimately, governance must be rebalanced to ensure farmer levy funds are managed with an unwavering focus on delivering value to those levy payers.

5. RD&E Priorities Toward Economic Outcomes for Farmers:
   The portfolio of RD&E investments should be realigned to address the core drivers of farm profitability and productivity. This means prioritising research and extension that target cost of production reduction, resource-use efficiency, yield improvement per unit input, risk mitigation, and product value enhancement – as opposed to projects that primarily increase output independent of cost or serve interests further down the supply chain. For example, with dairy RD&E, greater emphasis should be placed on feed and pasture innovations that lower feed costs per litre of milk, labour-saving technologies and system designs, herd improvement with clear economic merit, and farm business management tools that improve resilience. "Profitability first" should be a guiding principle in project selection.

6. Extension efforts:
   Extension Investment must be significantly bolstered and better coordinated: increase investment in regional extension staff and programs, collaboration with state government agencies to rebuild advisory services, and innovative knowledge-transfer models to speed up adoption. Commercial entities should not have the ability to 'double dip' using levy funds and additionally charging farmers for products. Every R&D project should have a companion extension plan to drive on-farm implementation. By refocusing on projects with high economic return potential and ensuring farmers are supported to adopt them, the industry can start to see real productivity growth.

Collectively, these recommendations aim to create a step-change in the effectiveness of the RD&E system, especially for dairy. We are confident that with stronger governance, accountability, and a farmer-centred approach, levy-funded R&D can yield positive, measurable outcomes – reversing the stagnation of the past decades.

Conclusion

Australian dairy farmers are innovative and resilient, but they need an RD&E system that truly supports their profitability in an increasingly challenging global market. The stakes are high, without urgent improvements we risk further milk production decline, erosion of international competitiveness, and the loss of dairy capacity in regional Australia. With the right reforms, however, RD&E can be a powerful engine of growth that underpins a profitable and sustainable future for Australia's dairy industry.

ADF appreciates the Panel's consideration of these issues and recommendations. The dairy sector's experience offers important lessons for Australia's broader R&D system – chiefly, that research outputs must translate into on-the-ground impact if they are to secure industry growth and public value.

ADF stands ready to collaborate on implementing solutions that improve the return on investment from dairy R&D for farmers, the government, and the Australian community. We are optimistic that, with reformed settings and renewed focus, the RD&E system can deliver transformational benefits in the decade ahead. We would be pleased to provide any further information or clarification as required.

Yours sincerely,

Ben Bennett
President
Australian Dairy Farmers