

28 October 2025

EPA Victoria
200 Victoria Street
Carlton, VIC, 3053
E: contact@epa.vic.gov.au

Australian Dairy Farmers Limited
Level 3, HWT Building
40 City Road
SOUTHBANK VIC 3006
Tel: +61 3 8621 4200
Fax: +61 3 8621 4280
www.australiandairyfarmers.com.au
ABN 76 060 549 653

Subject: Feedback on “Preparing a Risk Management and Monitoring Program (RMMP)” Guideline

Australian Dairy Farmers (ADF) and Dairy Australia (DA) welcome the opportunity to provide comment on the *Preparing a Risk Management and Monitoring Program (RMMP)* guideline.

About Australian Dairy Farmers (ADF)

Australian Dairy Farmers (ADF) is the national peak Industry Representative Body (IRB) representing all dairy farmers from across Australia’s six dairy producing states. ADF’s membership includes the State Dairy Farming Organisations from each State as well as direct farmer members.

About Dairy Australia

DA is the national services body for dairy farmers and industry. Its role is to help farmers adapt to a changing operating environment, and achieve a profitable, sustainable dairy industry. As the industry’s Research and Development Corporation, it is the ‘investment arm’ of the industry, investing in projects that cannot be done efficiently by individual farmers or companies.

Dairy Australia takes nutrient and effluent management seriously, with targeted RD&E investments aimed at improving the efficiency and effectiveness of nutrient use to boost productivity while protecting the environment. Current initiatives include a research project on *Odour Modelling*, extension programs such as *Design a Livestock Effluent System*¹ - which educates and accredits service providers in the design, management, and application of effluent systems - and the *Fertsmart* program², which supports the efficient use of fertilisers through workshops and tailored nutrient management plans. Dairy Australia also develops and provides practical, farmer-focused resources to support the responsible management of effluent systems across the industry.

¹ [Design Livestock Effluent Systems Course Returns in 2025 | Dairy Australia](#)

² [FertSmart Nitrogen Pocket Guide](#)

Summary

While we recognise that the guideline is designed to assist *permissioned duty holders* (licence and permit holders) to meet their obligations under the *Environment Protection Act 2017*, ADF and DA are concerned that RMMP expectations could extend to non-permissioned food and animal production businesses through shifts in the recognised state of knowledge or via Improvement Notices.

While RMMPs do not directly apply to dairy farms (below the 5,000-head licensing threshold), there is a credible risk that they will be applied *as written* in future compliance or enforcement settings. The framework's expectations for performance objectives, monitoring, and documentation are unrealistic in a farm context, as they do not reflect the operational realities of food production or the practical limitations of monitoring and data collection on farms.

ADF and DA therefore urges EPA Victoria to:

1. Clarify scope – confirm RMMP obligations apply only to permissioned duty holders and not as a benchmark for the General Environmental Duty (GED).
2. Recognise context – acknowledge the distinct operating environment of animal production is different to that of industrial operations, and ensure that any application of RMMP principles is tailored to the realities of animal production systems.
3. Collaborate with industry – co design practical guidance and enforcement tools that align with agricultural risk profiles and resource capacity.

Key Concerns

1. Scope and risk of regulatory creep

The guideline correctly targets permissioned licence and permit holders but includes language suggesting that other duty holders “will also find this framework useful.” Without explicit clarification, this could be interpreted by officers or auditors as prescriptive under the GED.

ADF and DA request that EPA:

- clearly confirm the RMMP framework does not create new or expanded obligations for non-permissioned businesses; and
- explicitly state that it must not be used as a compliance benchmark for the GED or to compel RMMP-style documentation for non-permissioned farms.

2. Improvement Notices and GED enforcement

The draft notes that EPA “may also require you to develop an RMMP through other means, such as an Improvement Notice.” This phrasing could lead to RMMP expectations being imposed on non-licensed businesses.

ADF and DA request that EPA clarify and confirm that:

- RMMPs are not to be required for farms through Improvement Notices, as this would be unworkable and impractical given the nature of farming systems (see point 3 for further detail);
- Any Improvement Notice issued to a farm result in a proportionate, risk-specific, and time-bound response, without creating ongoing or RMMP-style obligations; and
- The guideline does not establish new or expanded requirements for non-permissioned agricultural businesses.

3. Workability and on-farm practicality

The RMMP framework mirrors an ISO-style management system, requiring detailed performance objectives, measurable monitoring, auditing, and continuous improvement. While suitable for industrial operations, these expectations are unrealistic for farming systems. The requirement to establish and monitor quantitative performance objectives for effluent management does not reflect practical or economic reality. Dairy farms manage dynamic biological systems influenced by weather, animal movement, and seasonal variation - conditions that make continuous measurement and reporting reasonably practicable.

ADF and DA request that EPA:

- Recognise that farm-scale monitoring and reporting capability is limited, and that compliance should focus on system design, operation, and maintenance rather than laboratory-level measurement.
- Provide practical, qualitative examples of performance objectives that align with existing best practice.
- Clarify that the level of record-keeping and monitoring described in the guideline is not expected of farms, even where RMMP-style frameworks inform improvement planning.

4. Emerging issue – biogas and energy generation

There remains uncertainty about how on-farm biogas generation interacts with licensing and RMMP obligations. Covering effluent ponds for biogas capture should not trigger new licensing or risk management requirements, as this would disincentivise emissions-reduction and circular-economy initiatives.

ADF and DA request that EPA:

- Clarify how renewable energy generation will be treated under permission conditions.
- Ensure that environmental innovation is encouraged, not penalised, through duplicative or disproportionate regulatory requirements

Conclusion


ADF and DA appreciates EPA Victoria's efforts to strengthen environmental risk management. However, the RMMP framework, if applied without adaptation, would impose expectations that are not practical or reflective of on-farm realities. It is essential that the guideline remains targeted, proportionate, and workable, and that any future extension of its principles recognises the unique operating environment of food and animal production systems.

We would welcome the opportunity to work with EPA to clarify scope, ensure proportionality, and co-design practical compliance tools for the dairy sector.

For any questions please contact:

- Nathan Pope, Policy Manager, Australian Dairy Farmers - Nathan Pope [npope@australiandairyfarmers.com.au](mailto:n pope@australiandairyfarmers.com.au), 0438 603 681
- Sophie MacAskill, Policy Lead, Dairy Australia – Sophie.macaskill@dairyaustralia.com.au, 0429 561 518

Yours Sincerely,



Ben Bennett
President
Australian Dairy Farmers



Susannah Tymms
General Manager – Sustainable Dairy
Dairy Australia