

Australian Dairy Farmers

Response to ABS feedback request on Occupation Standard Classification for Australia (OSCA)

Contacts

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Executive Summary

1. The occupation 841233 Dairy Cattle Farm Worker is not accurately scoped because it currently captures both supervised entry-level dairy workers and independently competent dairy workers.
2. ADF proposes that the existing occupation remain at Skill Level 4, but that its definition and task list be tightened so it clearly describes the competent routine dairy worker, including routine independent milking operations, basic records, equipment fault reporting, hygiene, safety and biosecurity tasks.
3. ADF also proposes a new dairy-specific Skill Level 5 occupation within Unit Group 8412 Livestock Farm Workers titled Assistant Dairy Farm Worker, with alternative titles including Dairy Operator Grade 1A, Dairy Farm Assistant and Entry-Level Dairy Worker. The new occupation would cover supervised first-year workers undertaking foundational dairy tasks while learning the role.
4. This request is supported by the current Pastoral Award 2020, Dairy Australia's capability and workforce development material, JSA workforce data, and OSCA's own skill-level and design rules.

Submission

5. Australian Dairy Farmers (ADF) submit to keep the current senior and competent dairy occupations but fix the gap at entry level. That means retain 343233 Senior Dairy Cattle Farm Worker at Skill Level 3; retain 841233 Dairy Cattle Farm Worker at Skill Level 4 but tighten its description so it reflects an independently competent worker; and add a new dairy-specific Skill Level 5 occupation for a supervised entry-level role.
 - a. This approach fits the ABS consultation scope for the 2027 update, which is focused on 6-digit occupations and allows new occupations, skill level changes, and changes to titles, lead statements, tasks and inclusion or exclusion notes.
6. ADF's review of occupations and feedback from dairy farmers all point in the same direction. Dairy already has an identifiable progression from entry-level hands to competent operators and then to herd-management or supervisory roles, and that the main gap is the absence of a dairy-specific Skill Level 5 occupation. ADF does not argue that the existing dairy Skill Level 3 and 4 roles should be removed or collapsed.
7. The broader draft from the National Farmers' Federation (NFF) is supported by ADF, however it centres on a new agriculture-wide Skill Level 3 "experienced farm operator" proposal. That may be

a legitimate cross-sector migration argument, but dairy already has its own Skill Level 3 occupation in OSCA, 343233 Senior Dairy Cattle Farm Worker. For dairy, the classification gap is lower in the pathway, not higher.

What is already established

8. ADF has consistently stated that OSCA now recognises the top and middle of the dairy workforce ladder but still fails to separately recognise the supervised entrant who is learning the job in the first year. That is the core position that should be preserved.
9. ADF maps the broad dairy workforce ladder as: manager or farmer at the top, senior dairy worker or herd manager at Skill Level 3, competent dairy worker at Skill Level 4, and a missing dairy-specific entry point at Skill Level 5.

Farm and Livestock Hand Level	Role	Experience	OSCA Equivalent	OSCA Level
Level 1	Entry-level Dairy Operator (Grade 1A)	Less than 6 months	Not clearly defined	Level 5 (gap)
Level 2	Dairy Operator (Grade 1A)	6–12 months	Livestock Worker	Level 5 (gap)
Level 3	Dairy Operator (Grade 1B)	At least 12+ months	Dairy Farm Worker	Level 4
Level 5	Senior Worker	Advanced experience	Senior Dairy Worker	Level 3
Level 7	Herd Manager	High-level operational responsibility	Senior Dairy Worker	Level 3
Level 8	Farm Manager	Full farm management responsibility	Senior Dairy Worker	Level 3

Current OSCA position for dairy

10. OSCA 2024 already recognises a three-step dairy hierarchy. At the top, 152231 Dairy Cattle Farmer sits at Skill Level 1. In the skilled supervisory tier, 343233 Senior Dairy Cattle Farm Worker sits at Skill Level 3 and already includes the alternative title Dairy Herd Manager. In the routine worker tier, 841233 Dairy Cattle Farm Worker sits at Skill Level 4.
11. The problem is not that dairy is absent from OSCA. The problem is that the current OSCA ladder jumps from senior worker to competent routine worker without a separate dairy entry role, even though the 8412 Livestock Farm Workers unit group explicitly accommodates both Skill Level 4 and Skill Level 5 occupations.
12. In that unit group, dairy is only represented at Skill Level 4, while other entries such as 841241 Wool Handler and 841299 Livestock Farm Workers nec occupy Skill Level 5. This means the current framework can already accommodate a dairy-specific Skill Level 5 occupation without any structural change above the six-digit level.
13. The current description of 841233 Dairy Cattle Farm Worker is also a little too broad for the way the occupation is used in practice. ABS describes it as performing routine tasks on a dairy farm, with tasks such as feeding, moving cattle, washing and cleaning udders, using and sterilising milking machines, maintaining housing, and operating general farm machinery and water systems. Those are genuine dairy tasks, but the current description does not clearly separate supervised learners from independently competent workers.
14. That matters because OSCA's own design rules say occupations are meant to be mutually exclusive and statistically feasible. The ideal occupation size range is 300 to 10,000 employed persons, and the ABS uses 2021 Census data as the main source when testing statistical balance.

Evidence supporting a dairy-specific Skill Level 5 occupation

15. The clearest evidence comes from the current award framework published by the Fair Work Ombudsman. The Pastoral Award 2020 now explicitly distinguishes between a dairy operator grade 1A with less than 6 months' experience, a dairy operator grade 1A with 6 to 12 months' experience, and a dairy operator grade 1B with 12 months' experience. The grade 1A stages sit below the stage that the award recognises as grade 1B, and grade 1B is where the worker is described as using their skills to perform set procedures such as milking and attending livestock

with at least 12 months' experience in the industry. In other words, the current award structure itself recognises a pre-12-month entry pathway below the competent worker stage.

16. That award evidence lines up well with OSCA's own skill definitions. ABS says Skill Level 4 is broadly aligned to Certificate II, Certificate III, or at least one year of relevant experience. Skill Level 5 is aligned to compulsory secondary education or Certificate I, sometimes with only a short period of on-the-job training. A supervised dairy worker in the first year of employment fits the OSCA concept of Skill Level 5 much better than a routine independent dairy worker with around 12 months' experience.
17. The public labour market data are also strong enough to support a separate code. Jobs and Skills Australia (JSA) reports 4,200 employed Dairy Cattle Farm Workers, with 53.0% located in Victoria, a median age of 31, and a 41% part-time share. JSA's food supply chain study separately shows 4,130 Dairy Cattle Farm Workers employed in dairy farming itself, alongside 250 Senior Dairy Cattle Farm Workers. It also records that payroll jobs in dairy cattle farming fell by 1,390 jobs, or 14%, between 1 July 2021 and 29 February 2024.
18. Those figures do not directly count the entry-level cohort, but they still matter for OSCA statistical balance. Because the current dairy worker occupation contains about 4,200 workers, only around 7 to 8 per cent of that pool would need to belong to a distinct entry-level dairy occupation for it to clear ABS's ideal minimum occupation size of 300. That is an inference rather than a published count, but it is a reasonable one given the award-defined first-year stages and the size of the existing dairy worker occupation.
19. Industry capability material from Dairy Australia reinforces the same point. Dairy Australia says dairy farms now need higher skill levels because of technology, animal care, milk quality, farm inputs and environmental requirements; that it supports learning and development for people entering the industry and those already in it; and that its capability guide spans dairy farm roles from entry level right through to senior leadership roles.
20. It also publicly markets dairy farming as a job open to people with no previous experience, with skills developed on farm and pathways into broader careers. That is exactly the profile of an industry with a visible entry occupation rather than a workforce that begins only at the competent operator stage.
21. The shortage evidence, while not national in every jurisdiction, is still relevant. JSA's 2024 Occupation Shortage List shows both Dairy Cattle Farm Worker and Senior Dairy Cattle Farm

Worker in shortage in Victoria. Because Victoria holds just over half of the national Dairy Cattle Farm Worker workforce, classification accuracy in that labour market has national significance for analysing shortages, training needs and regional workforce planning, and migration settings.

Survey answers

Occupation already in OSCA that is not accurately described

22. The occupation ADF nominates is 841233 Dairy Cattle Farm Worker. The main problem is not that the title is wrong. The problem is that the occupation's current scope is too broad, because it absorbs both supervised first-year dairy workers and independently competent dairy workers, even though those groups sit at different skill levels under the current award and perform the work with different levels of autonomy.

Proposed principal title: keep Dairy Cattle Farm Worker.

23. That title is already understood and accurate for the competent routine worker cohort.

Proposed alternative titles: add Dairy Farm Operator and Dairy Operator Grade 1B.

24. Those titles would make the occupation more usable for coding and align it more closely with the language already used in industry practice and workforce arrangements.

Proposed definition:

25. Performs routine dairy farming tasks with a degree of independence on a dairy farm, including milking operations, herd movement, feed and water delivery, milking shed hygiene, basic machinery operation, basic production and livestock records, and general farm maintenance.

Excludes supervised entry-level dairy workers who are still developing core operational capability.

- a. This better reflects the current Skill Level 4 concept of Certificate II or III or about one year of relevant experience.

PROPOSED SKILL LEVEL: KEEP SKILL LEVEL 4.

26. The current award benchmark of grade 1B at 12 months and the existing OSCA Skill Level 4 definition both supports leaving the competent dairy worker at Level 4.

Proposed specialisations: none are essential.

27. The existing Skills Level 3 occupation already captures herd-manager type supervisory specialisation through Dairy Herd Manager.

Licensing and registration: no nationally mandated occupational licence or registration requirement should be added.

28. Farm-specific machinery, chemical or biosecurity obligations can apply, but they do not amount to a nationally defining licence or registration for the occupation. The current OSCA entry also records no such requirement.

Main tasks to add or clarify:

29. The ABS task list should add explicit reference to operating the milking plant safely, identifying and reporting equipment faults, recording routine dairy data such as vat temperatures and cow numbers, and carrying out routine hygiene, safety and biosecurity tasks.
30. It should also make clear that this occupation involves routine work performed with growing independence, rather than purely supervised starter work. Those additions reflect both the current award wording and the operational reality of competent dairy workers.

Supporting evidence:

31. The Pastoral Award now divides dairy workers below and at 12 months of experience; JSA records roughly 4,200 workers in the current occupation; DA describes dairy as an industry with structured entry-to-senior capability pathways; and OSCA's own Skill Level 4 definition aligns with the competent dairy worker stage, not the earliest supervised entry stage.

Impact of the inaccuracy:

32. Keeping 841233 too broad blurs the boundary between first-year learners and competent workers, weakens occupation coding quality, and makes it harder to see where the industry is attracting, retaining and progressing new entrants. In practice, it compresses a real workforce ladder into a single code.

Occupation that should be separately identified with a unique code

33. The proposed new occupation should sit within 8412 Livestock Farm Workers, which already accommodates both Skill Level 4 and Skill Level 5 occupations. This means the dairy change can be made inside the current OSCA framework without reopening the broader hierarchy.

Proposed principal title: Assistant Dairy Farm Worker.

34. This is the most practical principal title because it signals both the dairy setting and the inexperienced, supervised nature of the role.
35. Proposed alternative titles: Dairy Operator Grade 1A; Dairy Farm Assistant; Entry-Level Dairy Worker; Assistant Farm Hand. These titles align with the language used in the attached dairy drafts and the award structure, and they would improve coding of actual employer and worker responses.

Proposed definition:

36. Performs supervised entry-level tasks on a dairy farm while developing basic operational capability in milking, livestock care, hygiene, simple records, safe equipment use and general farm routines. Usually works under direction and does not yet perform the full range of routine dairy farming tasks independently.
- a. That is the cleanest way to make the occupation mutually exclusive with the current Skill Level 4 dairy worker.

PROPOSED SKILL LEVEL: SKILL LEVEL 5.

37. The role matches the current ABS definition of Skill Level 5 and the award-defined first-year stages that sit below the competent dairy worker benchmark.

Proposed specialisations: none.

38. The value of the new occupation is clarity at the base of the pathway, not further fragmentation.

Licensing and registration: none nationally.

39. As with other farm labour roles, local induction, safety training and employer-specific procedures may apply, but those are not national licensing or registration requirements.

Proposed main tasks:

40. Assist with milking operations under supervision; move cattle to and from milking and feeding areas; assist with calf care and routine livestock welfare tasks; clean the milking shed and associated work areas; safely operate basic milking or farm equipment under direction; identify and report equipment not operating normally; record simple information such as vat temperatures and cow numbers; assist with fencing, haymaking and other basic farm duties; and follow workplace safety, hygiene and biosecurity procedures.
- a. These tasks come directly from the current award's grade 1A framing and from OSCA's existing dairy task base.

Supporting evidence:

41. This occupation is supported by four independent strands of evidence: the current award clearly identifies a first-year dairy worker stage; Dairy Australia's capability framework explicitly spans entry-level to senior roles; JSA records a large existing dairy worker occupation from which an entry-level subset would only need a modest share to exceed the ABS occupation-size threshold; and the dairy sector is experiencing labour pressure in the state where most dairy workers are located (although all states are experiencing labour pressures).

Why a unique code is needed: a residual code is not enough.

42. OSCA already recognises that dairy work is distinct enough to justify a dairy-specific code at Skill Level 4 and a dairy-specific supervisory code at Skill Level 3. The missing issue is precision at the base of the dairy ladder. A unique six-digit code would improve workforce data, support training and entry pathways, and better reflect how dairy farms actually recruit and develop labour.

Additional notes:

43. The main evidence gap is that there is no easily accessible published national dataset that counts the exact number of workers currently sitting in the award-defined grade 1A dairy stages.
44. So the case that the new occupation would meet the ABS occupation-size threshold relies on a reasonable inference from the much larger current dairy worker occupation, the award-defined first-year stages, and the sector's documented entry-to-senior workforce pathway.