

Australian Dairy Farmers

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

Contacts

Nathan Pope Policy Manager, Australian Dairy Farmers

0438 603 681 | npope@australiandairyfarmers.com.au

Executive Summary

1. Australian Dairy Farmers (ADF) maintains the position put to the ABS in April 2026: OSCA should retain the existing senior and competent dairy occupations, while fixing the remaining gap at entry level.
2. ADF supports retaining 343233 Senior Dairy Cattle Farm Worker at Skill Level 3. Dairy already has a recognised senior occupation and does not need that part of the workforce ladder rebuilt.
3. ADF proposes retaining 841233 Dairy Cattle Farm Worker at Skill Level 4, but tightening its definition and task list so it clearly describes an independently competent routine dairy worker.
4. ADF proposes a new dairy-specific Skill Level 5 occupation within Unit Group 8412 Livestock Farm Workers titled Assistant Dairy Farm Worker. This occupation would cover supervised first-year workers developing core dairy capability.
5. The August 2026 proposed OSCA changes do not address the dairy gap, but they strengthen ADF's case. The draft demonstrates that ABS is prepared to create new occupations, separate roles to improve occupational boundaries and change skill levels where the existing classification does not accurately reflect workplace competency.

Submission

6. This submission updates ADF's April 2026 response in light of the ABS August 2026 consultation draft and the proposed changes circulated to industry. ADF's core position is unchanged.
7. The August consultation provides useful precedents for dairy. The principles being applied elsewhere in OSCA — clearer occupational boundaries, accurate recognition of competency and differentiation between skill levels — are the same principles ADF is asking ABS to apply to the dairy workforce.
8. ADF supports the broader agriculture work being progressed through the National Farmers' Federation, including changes intended to better recognise experienced farm operators. However, dairy already has its own Skill Level 3 occupation. For dairy, the classification gap is lower in the pathway, not higher.

What is already established

9. ADF has consistently stated that OSCA 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 remains the core issue.
10. 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

August 2026 proposed changes support the dairy ask

11. The August draft proposes a substantial number of new occupations and unit-group changes. This confirms that the 2027 update remains capable of adding a new six-digit occupation where a

distinct role can be demonstrated.

12. The proposal to separate Formwork Carpenter from Carpenter (General) is a useful precedent. It recognises that clearer occupational boundaries can justify a separate occupation rather than continuing to combine materially different work within a broader code.
13. The proposed reclassification of Drycleaner from Skill Level 5 to Skill Level 4, together with a unit group containing both Skill Levels 4 and 5, confirms that OSCA can distinguish workers by competency within the same broader occupational structure. Unit Group 8412 already accommodates Skill Levels 4 and 5.
14. The proposed change for Apiarist from Skill Level 1 to Skill Level 3 also shows that ABS is prepared to materially change an agricultural occupation where the existing classification does not accurately represent workplace competency.
15. The August draft retains 343233 Senior Dairy Cattle Farm Worker within the Senior Livestock Farm Workers structure. This supports ADF's view that the senior end of the dairy workforce ladder is already recognised and the unresolved gap remains at entry level.

Current OSCA position for dairy

16. OSCA 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 includes the alternative title Dairy Herd Manager. In the routine worker tier, 841233 Dairy Cattle Farm Worker sits at Skill Level 4.
17. The problem is not that dairy is absent from OSCA. The problem is that the framework jumps from senior worker to competent routine worker without a separate dairy entry role, even though Unit Group 8412 Livestock Farm Workers accommodates both Skill Level 4 and Skill Level 5 occupations.
18. The current description of 841233 Dairy Cattle Farm Worker is too broad because it does not clearly separate supervised learners from independently competent workers. That distinction is real in dairy workplaces and is reflected in the current award structure.
19. OSCA occupations are intended to be mutually exclusive and statistically feasible. ADF's proposal improves that boundary by separating a supervised first-year worker from the competent routine worker who performs the role with a degree of independence.

Evidence supporting a dairy-specific Skill Level 5 occupation

20. The clearest evidence comes from the current Pastoral Award 2020. The award distinguishes 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 at 12 months. The award therefore recognises a first-year pathway below the competent worker stage.
21. That award evidence aligns with OSCA's skill definitions. 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 first-year dairy worker fits the Skill Level 5 concept more closely than the competent routine worker.
22. Jobs and Skills Australia reports around 4,200 Dairy Cattle Farm Workers nationally. ADF's April submission noted that only a modest share of that workforce would need to sit in the first-year cohort for a separate occupation to satisfy the ABS preferred occupation-size threshold.
23. Dairy Australia's capability and workforce-development material also reflects a structured progression from entry-level roles through to senior leadership. Dairy is an industry where people can enter with no previous experience, develop capability on farm and progress into more senior roles.
24. The August consultation adds a further strand of evidence: ABS is already proposing structural and skill-level changes elsewhere where clearer occupational boundaries or more accurate competency recognition are required. Dairy should be treated consistently.

Occupation already in OSCA that is not accurately described

25. The occupation ADF nominates is 841233 Dairy Cattle Farm Worker. Its title should be retained, but its scope should be tightened so it describes the competent routine dairy worker rather than also absorbing supervised first-year workers.

Proposed principal title: keep Dairy Cattle Farm Worker.

26. The existing title is understood and accurate for the competent routine worker cohort.

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

27. These titles align the occupation more closely with language already used in industry practice and workforce arrangements.

Proposed definition:

28. 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.

PROPOSED SKILL LEVEL: KEEP SKILL LEVEL 4.

29. The award benchmark of grade 1B at 12 months and the existing OSCA Skill Level 4 definition support retaining the competent dairy worker at Level 4.

Proposed specialisations: none are essential.

30. The existing Skill 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.

31. Farm-specific machinery, chemical or biosecurity obligations can apply, but they do not amount to a nationally defining licence or registration for the occupation.

Main tasks to add or clarify:

32. The task list should explicitly recognise safe operation of the milking plant, routine independent milking, identification and reporting of equipment faults, basic dairy records, herd movement, feeding and water delivery, and routine hygiene, safety and biosecurity procedures.
33. The occupation should be clearly framed as routine work performed with a degree of independence, rather than supervised starter work. That is the operational boundary between the proposed Skill Level 4 and Skill Level 5 occupations.

Occupation that should be separately identified with a unique code

34. The proposed new occupation should sit within Unit Group 8412 Livestock Farm Workers, which already accommodates both Skill Level 4 and Skill Level 5 occupations. The change can therefore be made within the existing OSCA framework.

Proposed principal title: Assistant Dairy Farm Worker.

35. This title clearly signals both the dairy setting and the inexperienced, supervised nature of the role.

Proposed alternative titles: Dairy Operator Grade 1A; Dairy Farm Assistant; Entry-Level Dairy Worker; Assistant Farm Hand.

36. These titles align with the award structure and language used in the dairy workforce and would improve coding of actual employer and worker responses.

Proposed definition:

37. 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.

PROPOSED SKILL LEVEL: SKILL LEVEL 5.

38. The role matches the OSCA concept of Skill Level 5 and the award-defined first-year stages that sit below the competent dairy worker benchmark.

Proposed specialisations: none.

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

Licensing and registration: none nationally.

40. Local induction, safety training and employer-specific procedures may apply, but those are not national licensing or registration requirements.

Proposed main tasks:

41. 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.

Supporting evidence:

42. The proposed occupation is supported by the award-defined first-year dairy worker stages, Dairy Australia's entry-to-senior capability pathway, the size of the existing dairy worker occupation, and the OSCA skill-level definitions. The August consultation further demonstrates that ABS can create

new occupations and differentiate skill levels where the classification evidence supports doing so.

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

- 43. Dairy already has dairy-specific occupations at Skill Levels 3 and 4 because the work is sufficiently distinct to warrant separate recognition. The missing issue is precision at the base of the dairy ladder. A unique six-digit occupation would improve workforce data, support training and entry pathways, and better reflect how dairy farms recruit and develop labour.
- 44. A residual livestock code would continue to hide the first-year dairy workforce and would not create a clean, mutually exclusive boundary with 841233 Dairy Cattle Farm Worker. The separate occupation is the clearer statistical and workforce-planning solution.

Recommendations

- 45. Retain 343233 Senior Dairy Cattle Farm Worker at Skill Level 3.
- 46. Retain 841233 Dairy Cattle Farm Worker at Skill Level 4 and amend its definition and task list to reflect independently competent routine dairy work.
- 47. Create a new dairy-specific Skill Level 5 occupation, Assistant Dairy Farm Worker, within Unit Group 8412 Livestock Farm Workers.
- 48. Apply the same classification principles evident in the August 2026 draft — clearer occupational boundaries, accurate recognition of competency and skill-level differentiation — when considering the dairy proposal.

Additional notes:

- 49. ADF's April 2026 submission remains the detailed evidence base for the dairy proposal, including the Pastoral Award 2020, Jobs and Skills Australia workforce data and Dairy Australia capability and workforce-development material.
- 50. The August consultation has not removed the dairy classification gap. It has strengthened the case for fixing it.