

**ADPF Submission to Jobs and Skills Australia
2025 Core Skills Occupations List (CSOL) Consultation
Submitted: September 2025**

Executive Summary

The Australian Dairy Products Federation (ADPF) welcomes the opportunity to provide this submission to Jobs and Skills Australia (JSA) as part of its consultation on the 2025 Core Skills Occupations List (CSOL), to inform the national migration program and needed occupations under the employer-sponsored temporary Skills in Demand visa.

This builds on our submission to the Draft Core Skills Occupations List (CSOL) in June 2024.

The Australian dairy processing sector faces a critical workforce challenge, particularly in regional areas where labour competition is already acute. Employers are struggling to attract and retain skilled staff due to:

- High competition for labour from other regional industries.
- Rapidly increasing technological demands, requiring higher levels of digital, automation, and quality assurance skills.
- Imminent loss of expertise, with more than 50 per cent of the current workforce expected to retire within the next five to 10 years, taking with them deep institutional and industry knowledge.

At the same time, more than 70 per cent of future jobs in the sector are projected to be filled by entrants who are new to dairy processing.

ADPF's 2025 Workforce Survey (see Appendix 1) found vacancy rates average five per cent – double the Australian all-industry average. Some sites reported more than 250 vacancies.

Critically, shortages are concentrated in production workers, quality control specialists, logistics managers, electricians, and technicians. These roles are core to daily operations, regulatory compliance, and business continuity.

If left unaddressed, shortages in these occupations will constrain processing capacity, jeopardise Australia's \$18.5 billion dairy sector, and threaten both domestic food security and export performance.

Migration is not a substitute for training, but a necessary complement. Skilled migration provides the immediate workforce capability needed to sustain production, while domestic education and training systems scale up – noting the shortage of specialty dairy processing skills training, particularly in regional locations.

Our submission sets out:

- ADPF's endorsement of occupations targeted for consultation in the 2025 CSOL that are critical to dairy processing and supply chains.
- ADPF's recommendations for new inclusions and amendments, ensuring specialist dairy manufacturing occupations are adequately recognised.

Recommendations

ADPF recommends that Jobs and Skills Australia:

1. Endorse the occupations listed in the 2025 CSOL targeted for consultation that are critical to dairy processing.
2. Include the additional dairy-specific occupations and amendments (as per our 2024 submission and outlined in table two below) to ensure the CSOL reflects the unique skills required in dairy manufacturing.
3. Ensure migration settings account for regional and specialist shortages, with pathways that are accessible to dairy processors across Australia.
4. Work with ADPF and industry partners to strengthen domestic training pipelines for dairy manufacturing, while recognising that migration is essential in the short term to sustain production and exports.

About Australian Dairy Products Federation

The Australian Dairy Products Federation (ADPF) is the lead policy and advocacy body representing the nation's dairy manufacturing industry, which supports more than 70,000 jobs and generates \$18.5 billion in overall economic impact across products and value chains.

We provide a collective and powerful voice to key opinion leaders to ensure processors significant economic, social and health benefits of Australian branded and locally produced dairy products, is well recognised.

Our members are multi-national organisations through to single-plant companies, who work across rural and regional Australia.

They are responsible for processing about 90 per cent of Australia's total milk pool and together represent most of the milk, cheese, yoghurt, butter, ice-cream and dairy ingredients produced and marketed in Australia and sold throughout the world.

2025 CSOL targeted for consultation

Endorsements of occupations in Draft 2025 CSOL

ADPF welcomes and supports the inclusion of the following occupations in the 2025 CSOL. These occupations are essential to dairy processing operations and vital to sustaining regional economies where dairy factories are major employers.

OSCA Code	Occupation Title	Evidence and Rationale
721132	Warehouse Supervisor	<ul style="list-style-type: none"> Logistics and outbound transport are identified as major pinch points, with ageing workforces and weak replacement pipelines. ADPF's 2025 survey data shows about 43 per cent of responded experienced difficulty filling production worker (skilled and unskilled) roles. Warehousing and distribution are essential to get perishable dairy products to market.
381233	Industrial Electrician	<ul style="list-style-type: none"> Industrial Electricians are vital to maintaining the highly automated systems that underpin dairy manufacturing. Unplanned downtime from lack of technical capacity can halt production lines, compromise food safety, and cause multimillion-dollar losses. 71 per cent of respondents to ADPF's 2025 survey reported difficulty recruiting for these roles. These shortages are structural, reflecting both limited regional supply of electricians and poaching from other sectors.
343233	Senior Dairy Cattle Farm Worker	<ul style="list-style-type: none"> Upstream stability is critical. Without skilled on-farm workers, processors face supply chain disruption.
111633	Work Health and Safety Manager	<ul style="list-style-type: none"> Rising regulatory and compliance expectations demand skilled oversight to ensure workplace safety and product integrity. Dairy processors operate under complex food safety, workplace safety, and environmental compliance regimes.

OSCA Code	Occupation Title	Evidence and Rationale
		<ul style="list-style-type: none"> A shortage of WHS professionals undermines both compliance and workplace culture, raising risks of injury, food contamination, and regulatory breach.
382233	Electronic Instrument Technician	
313999	Engineering Technicians	
272232	ICT Support Engineer	
243937	Mechatronics Engineer	
243999	Engineering Professionals	
243133	Materials Engineer	
113231	ICT Operations Manager	
113233	ICT Service Delivery Manager	<ul style="list-style-type: none"> Instrument technicians are critical for precision control of temperature, flow, and pressure in dairy processing. Failures in these systems pose both economic and food safety risks. The 2025 survey identified specialist processing technologists as causing the most significant disruption to business productivity and profitability when vacancies could not be filled.

Proposed new inclusions and amendments

While we endorse the occupations above, we also urge JSA to recognise dairy-specific occupations not adequately captured under generic classifications. This aligns with ADPF's 2024 submission and is strongly supported by new survey evidence.

ADPF Occupation Title	Status	Suggested ANZSCO / OSCO Code	Official Occupation Title	Evidence, Rationale, Suggested Change
Dairy Food Production Manager Manufacturing	New	133512	Production Manager (Manufacturing)	<ul style="list-style-type: none"> Production managers coordinate entire manufacturing shifts, balancing food safety, workforce supervision, and throughput. With 55 per cent of the workforce concentrated in production, shortages here are systemic. Without skilled managers, productivity, compliance, and worker safety are compromised.
Dairy Food Quality Assurance / Control Officer	New	234212	Food Technologist	<ul style="list-style-type: none"> Quality Assurance staff safeguard Australia's reputation for "clean and green" dairy exports. In 2025, 29 per cent of processors reported difficulty filling QA vacancies. This shortage has direct implications for export market access and biosecurity.
Dairy Food Packaging Technologist	New	234212	Food Technologist	<ul style="list-style-type: none"> In 2025, 14 per cent of processors reported difficulty filling Dairy Food Packaging Technologist roles.
Dairy Food Automation Engineer	New	233512	Mechanical Engineer	<ul style="list-style-type: none"> Automation engineers are essential to modernise the sector, driving productivity, reducing emissions, and compensating for limited labour supply.

ADPF Occupation Title	Status	Suggested ANZSCO / OSCO Code	Official Occupation Title	Evidence, Rationale, Suggested Change
				<ul style="list-style-type: none"> Specialist technologists were identified as the second most disruptive shortage in 2025 survey results, reflecting the criticality of these roles to dairy's transition to "world best" technology platforms.
Supply & Distribution Manager	Proposed	133611	Supply and Distribution Manager	<ul style="list-style-type: none"> Broaden to include <i>Dairy Food Manufacturing Supply and Distribution Manager</i>.
Regulatory Affairs Manager	Proposed	224999 or 133599	Information & Organisation Professionals or Production Managers	<ul style="list-style-type: none"> Include <i>Dairy Food Regulatory Affairs Manager</i>
Technologists	Proposed	234212	Food Technologist	<ul style="list-style-type: none"> Expand descriptors to include <i>Dairy Food Packaging and Automation</i>.
Dietitians	Proposed	251111	Dietitian	<ul style="list-style-type: none"> Expand the definition to include <i>Dairy Food Industry</i>

Without explicit recognition of these dairy-specific occupations, migration levers cannot effectively be used to relieve critical shortages, putting production, export earnings, and regional jobs at risk.

Conclusion

The dairy industry is too large to risk, with 95 per cent of milk processed in regional communities. It contributes to food security, underpins regional economies, and generates export earnings exceeding \$3 billion annually.

Without urgent intervention, workforce shortages will escalate, leading to reduced processing capacity, higher costs of production, and constrained export growth.

Migration, alongside domestic skills investment, is needed to help sustain operations in the critical five-to-10-year transition period.

ADPF strongly urges JSA to adopt our recommendations for both the endorsement of identified CSOL occupations and the inclusion of dairy-processing specific roles, to inform the immediate needs of their national migration strategy.

We are available to discuss any of our responses in more detail.

ADPF would also welcome the opportunity to invite Jobs and Skills Australia, relevant Ministers, and members of parliament to visit a dairy processing site and learn first-hand the issues and recommendations outlined in our submission.



Appendix

ADPF Workforce survey – July 2025

Survey purpose: To collect up-to-date evidence on workforce shortages and recruitment challenges across the Australian dairy processing sector.

Survey administration

Conducted by: Australian Dairy Products Federation (ADPF).

Mode: Online survey (structured questionnaire).

Timing: July 2025.

Sample size and coverage

provided by senior HR and workforce managers, with access to company-wide vacancy and workforce data.

Survey design

Questions focused on:

- Vacancy rates (as percentage of workforce).
- Absolute vacancy numbers by site.
- Occupations most difficult to recruit.
- Occupations causing most disruption when unfilled.
- Data collected included both quantitative (numerical vacancy data, percentages, age distribution) and qualitative (comments on workforce challenges, recruitment barriers, competition for labour).

Data quality and reliability

- Survey responses were based on internal HR systems and operational workforce data, not estimates.
- The recency of collection (mid-2025) ensures information reflects current labour market conditions.
- Access to 90 per cent of national processing capacity, providing a robust and authoritative snapshot of dairy sector workforce challenges.

Limitations

- Small sample size in absolute terms. However, high industry concentration means results are significant at the dairy processing industry level.
- Results are specific to the dairy processing sector and may not be generalisable to other food manufacturing industries.

Summary of findings

	Range	Average
Workforce shortages as a percentage	3-9%	5%
Workforce shortage as a figure	2-285	75

Vacancies with the most significant disruptive impact on business productivity and profitability.

Job	Respondents who selected this option (%)
specialist dairy processing technologists	71.43
service or maintenance personnel	71
Other	Laboratory, Sales & Operations Planning, Technical

Skill categories which are the most difficult to fill

Job	Respondents who selected this option (%)
Production workers (skilled and unskilled)	42.86
Management (including HR/Strategy/Finance)	28.57
Laboratory and quality control	28.57
Product research and development (including food technologists, and packaging technologists)	14.29
Engineering and maintenance technicians	71.43
Other	Supply Chain (Planners)

Please note: The Dairy Processing Workforce Issues and Challenges Final Report (2022) was provided in ADPF's 2024 submission. This report can be provided again on request.