

# Medicinal Crops Project



## Summary of Validation Feedback, Responses and Actions

### June 2020

This project includes the development of two qualifications, 13 units of competency and 4 skills sets relevant to skills for cultivation and production of medicinal cannabis within the *AHC Agriculture, Horticulture, Conservation and Land Management Training Package*. Draft materials were developed as a result of initial input from Subject Matter Experts (SMEs) and were made available for broader stakeholder consultation and feedback between 4 October – 5 November 2019. The feedback was discussed with the SMEs and changes were made to the draft components. The resulting final draft materials were then made available for validation and comment between 3-28 February 2020. Please visit the [Skills Impact Website](#) to view a list of the qualifications, units of competency and skills sets that were available for feedback during these periods.

A validation meeting was held on 26 February 2020 where all documents were validated through this process.

Validation feedback was also received from a variety of stakeholders around the country via phone, emails and surveys. The table below provides an overview of the groups and jurisdictions that have provided feedback during this phase of the project

	ACT	NSW	NT	Qld	SA	Tas	Vic	WA	National
<b>Industry (employer / employee)</b>									
<b>Industry association</b>									
<b>Union</b>									
<b>Registered Training Organisation (RTO)</b>									
<b>Government department</b>									

*\* Note: No organisations have a license to cultivate and produce medicinal cannabis in the Northern Territory or Australian Capital Territory at this time.*

Below is a summary of the issues raised for the draft qualification, units of competency and skill sets developed and reviewed for the Medicinal Crops project, and how these issues have been dealt with. This involves a consideration of the information provided, views of industry stakeholders and from people who are part of the Subject Matter Expert Working Group process. Resolutions are constructed to consider the needs and views of stakeholders to the extent possible, and to comply with the Standards for Training Package 2012. The resolutions may represent a compromise on one or more stakeholder views with the aim of a workable outcome for industry, State and Territory Training Authorities (STAs) and training providers.

Acronyms - PC – Performance Criteria, PE – Performance Evidence, KE – Knowledge Evidence, AC – Assessment Conditions, SMEs – Subject Matter Experts

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## Summary of Feedback on Draft Qualifications

### General Qualification Comments and Feedback

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association SA	<p>Certificate II</p> <p>Question regarding requirement and demand for a qualification at this level. How many industries would employ with these qualifications?</p> <p>View is that majority of employees are likely to have some level of skills (e.g. cert III) level being the type of 'capable' person they would need.</p> <p>Only relevant as 'induction' to work in the industry?</p>	<p>Initially a certificate II level qualification in the cultivation and production of medicinal cannabis was considered for development for individuals entering the industry in 'assistant' level roles. However, further input provided to the project from some state training authorities and some members of the APHIRC suggested that entrants into this sector, at this level, should be provided with the opportunity to develop a broad range of horticultural skills in both broadacre and protected cropping systems. Therefore, three units of competency developed for 'assistant' roles in propagation, growth and harvesting of medicinal cannabis plants will be available for inclusion in existing qualifications as elective choices rather than within a specialist qualification specific to the cultivation of medicinal cannabis. The three newly developed units, listed below, will be included in the elective groups of AHC20320 Certificate II in Production Horticulture (Elective Group C) and AHC21819 Certificate II in Protected Horticulture (Group E General electives):</p> <ul style="list-style-type: none"> <li>o AHCMDC201 Assist with propagation of medicinal cannabis</li> <li>o AHCMDC202 Assist with care and maintenance of medicinal cannabis</li> <li>o AHCMDC201 Assist with harvest and pre-processing of medicinal cannabis</li> </ul>
RTO VIC and QLD	Supports qualification. No issues (provided via feedback hub)	See comments above

<p>APH IRC members</p>	<p>Consultation regarding whether a Certificate II level qualification in the production and cultivation of medicinal cannabis should be developed was part of a broader discussion at two APHIRC meetings held on 17 March and April 28, 2020. Discussions centered around three options for qualification pathways in the medicinal crops sector:</p> <p>Option 1. APHIRC support the adoption of three qualifications (Certificates II, III and IV level) and seek to submit a “Change of Scope” to the project for AISC approval.</p> <p>Option 2. APHIRC not support new qualifications for the cultivation and production of medicinal cannabis and recommend adoption of original project scope for the development of skills sets only.</p> <p>Option 3. APHIRC support the Certificate III and IV qualifications with pathway options within existing Certificate II level qualifications and seek to submit a “Change of Scope” to the project for AISC approval</p>	<p>At these meetings, Skills Impact prepared information to help promote discussion about the three options listed above, including mapping requirements showing comparisons between volume of training required and the relationships between current qualifications and potential newly developed medicinal cannabis qualifications, skill sets and streaming. The APH IRC Chair sought to achieve consensus among APHIRC members and proposed a vote be conducted to establish if members supported the skills set only option or to seek a change of project scope (required for Options 1 or 3). A vote was taken with a majority of APHIRC members voting to accept Option 3. One IRC member abstained from the vote. As a result, Skills Impact formally requested a change of scope to the 20-06 Medicinal Crops project and undertook the necessary work associated with this option.</p>
<p>Industry Employers QLD and VIC Validation meeting</p>	<p>Supports qualifications. Areas to check. Appears to be a high level of compliance for a Certificate II level - would not be required to 'fix' a problem (check wording around that)</p> <p>All Trainees would need skills to weigh and record</p>	<p>See comments above</p> <p>At a Certificate II level, compliance is around security of cannabis, which includes weighing and recording waste. Individuals at this level are required to recognise potential risks and issues and escalate these to the supervisor.</p>
<p>Industry Employers QLD, VIC, NSW, SA, WA Validation meeting</p>	<p>Supportive of qualifications including packaging rules and structure.</p>	<p>See comments above</p>
<p>RTO VIC and Industry Employer QLD</p>	<p>Supports qualification. Information provided via Skills Impact feedback hub</p>	<p>See comments above</p>

## Specific Qualification Comments and Feedback

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<b>Certificate III in Medicinal Cannabis Cultivation and Production</b>		
Industry Association SA	<p>Include a unit about controlling plant pests and diseases?</p> <p>Should FBPPHM3003 Work in a controlled environment be core in this qualification to allow for transfer of skills across other sectors?</p> <p>Are any AHC units re preparing growing media relevant to be included in elective bank?</p> <p>Change packaging rule numbers from '4 elective and 4 imported to '5 and 3' to protect integrity of qualification to specific roles (RTO's may be inclined to deliver imported units which don't have a specific enough link to the job role)</p>	<p>Unit about controlling plant pests and diseases was considered; however, a relevant unit wasn't found to be available as only biological controls can be used for pest management in this industry (no chemical-based pest controls are used).</p> <p>Suggestions for additional units to be included in qualification elective lists were considered. The unit <i>AHCWRK207Collect and record production data</i> was added to the elective group of the newly developed draft Certificate III in Medicinal cannabis cultivation and production and <i>MSL907316 Perform aseptic techniques</i> was added to the elective group of the initial Certificate IV level qualification draft.</p> <p>Industry was not supportive of the inclusion of extra core units from other training packages during the development stage. Content on growing media is also included in the growing specific units. Industry is supportive of the imported ruling for this qualification based on its strong core. The packaging rules specify the rules regarding the selection of imported units which must ensure the integrity of the qualification's Australian Qualifications Framework (AQF) alignment and contribute to a valid, industry-supported vocational outcome.</p>
<b>Certificate IV in Medicinal Cannabis Cultivation and Production</b>		
RTO VIC	<p>Question - rules allow for 5 of 9 electives to be from another qual (one third of the 15 units). Is this overly flexible? No other issues identified</p>	<p>The packaging rules for choosing electives has been amended from '4 electives and 5 imported to '5 and 4' to protect the integrity of the qualification.</p>

RTO QLD	<p>Answered NO to Q4 in survey 'In your view does this final draft meet the needs of industry?'</p> <p>Follow up comment to above - If the qualification is targeted for managerial position in industry then one of the cores must have some 'Develop' attribute to unit of competency</p> <p>If feedback above is addressed, then respondent will be satisfied that the qualification meets the needs of industry.</p>	<p>There are components of 'develop' tasks in the three growing and harvest units that make up part of the core, where it is required to develop the plan (propagation, maintenance, harvest etc.).</p>
Industry Employer VIC	<p>Answered NO to Q4 in survey 'In your view does this final draft meet the needs of industry?'</p> <p>Follow up comment to above - Looks suitable but just a query: Are GACP principles covered in the core units - e.g. AHCMDC403 - Plan and implement a propagation program for medicinal cannabis and AHCMDC404 - Plan and implement a care and maintenance program for medicinal cannabis? If yes, it appears suitable as is.</p> <p>Query: Should elective "AHPCM501 - Diagnose plant health problems"- be one of the core units (or at least a group B option) for the Cert IV qualification? E.g. "Choose 5 electives from A, of remaining electives, at least 1 elective should be from Group B" ... Just a thought.</p> <p>Overall, it looks suitable and those are simply querying as I'm assuming GACP would be included in the core unit content meets the needs of industry?</p>	<p>No change required.</p> <p>GACP principles and practices are incorporated in 'Plan and implement' core units, Industry didn't identify 'Diagnose plant health problems' as core, as this content is also covered in all 'plan and implement' core units.</p>

<p>Industry Association SA</p>	<p>Leadership is part of the job role, but this is not reflected in the core. - include units related to 'working in teams' and/or 'supervision?</p> <p>Should units about working in a controlled environment and good manufacturing be core in this qualification as core requirement for the job role (RG note that units from other training packages in core of qualifications can cause particular issues)</p> <p>Change packaging rule numbers from '4 elective and 5 imported to '5 and 4' to protect integrity of qualification to specific roles (RTO's may be inclined to deliver imported units which don't have a specific enough link to the job role)</p> <p>Another option to protect integrity of the qualification (so it remains specific for the industry) may be to reduce the total number of units. JF expressed a view that wasn't good practice if qualifications keep getting bigger at cert IV level. Typically, cert IV quals have fewer overall numbers of units and higher number of core?</p>	<p>The Certificate IV reflects roles at the supervisory or managerial level. Skills and knowledge related to working in teams and supervisions are included in all core units. The packaging rules for choosing electives has been amended from '4 electives and 5 imported to '5 and 4' to protect the integrity of the qualification.</p> <p>The certificate IV qualification reflects roles at the supervisory or managerial level. Skills and knowledge related to working in teams and supervision are included in all core units. To protect the integrity of the qualification, the packaging rules for selection of elective units of competency has been amended to reduce the number of elective units selected from any currently endorsed Training Package or accredited course from 5 to 4.</p>
<p>Industry Employer VIC and QLD Validation meeting</p>	<p>Supports qualification. Check Certificate IV title for spelling Weighing of material because will need to reconcile</p>	<p>Certificate IV title corrected. Weighing of material included in individual units.</p>

## Summary of Feedback on Units

<b>AHCMDC301 Apply security regulatory requirements to work in the medicinal cannabis industry</b>		
Industry Association NAT	Replace 'container quantity' with 'entry' in PC2.2  Sites will have entry restrictions which include container quantity requirements	PC2.2 amended to read;  'Comply with inspections and entry restrictions.'
Industry Employer QLD, WA and Industry Association NAT	Element 4 – 'Comply with cannabis disposal and destruction regulatory requirements'  This should include all cannabis material (seed, cuttings, harvest material) not just waste.	Element 4 is related to disposal and destruction of waste  Added 'any parts of' to 'cannabis that is not to be manufactured into a medicinal product' to PC4.1 for clarity, as this may include seed, cutting and harvest material waste.  PC4.1 now reads – 'Weigh and store, dispose of or destroy any parts of cannabis that is not to be manufactured into a medicinal product according to workplace procedures and regulatory requirements
Industry RTO	'Agree that PC2.2 should use entry requirements or other clearance requirements. Typo in 4.2	PC2.2 amended to read, 'Comply with inspections and entry restrictions'.  PC4.2 corrected to read, 'Clean and sanitise equipment that has been in contact with cannabis to ensure residual cannabis is removed to prevent the risk of diversion'.
<b>AHCMDC201 Assist with propagation of medicinal cannabis</b>		
RTO VIC	Question re Element 2 - 'Assist with preparation of plant material'  Should this element be 'Assist with propagation of plant material'? as the PCs go beyond the preparation of plant material.  2.1 to 2.3 relates to assisting with the preparation of propagation material. 2.4 onwards is the actual propagation process. 2.8 crosses into the monitoring in element 3.	Element 2 amended to read 'Assist with propagation of plant material.'  'Monitoring' has been removed from PC2.8 to avoid crossover with Element 3 which is about monitoring propagation material health and environmental climate conditions



<p>Validation Meeting Participants (Industry Employers VIC, NSW, QLD, SA, WA)</p>	<p>Discussion that it is an 'assistant' responsibility to know that SOP's exist, and they are required to follow them for aspects of their job role. They need to know how to access required SOPs e.g. ensuring their task requirements are in line with SOPs</p> <p>Propagation units in general - discussion about whether or not cell tissue be separated from other areas. Cloning and tissue culture needed in KE. (specifics of tissue culture - not seeds and clones). Could be changed to and/or?</p> <p>There is a requirement to select cutting material and collect cutting from plant. At this level would 'assist' with taking cutting</p> <p>Need to refer to care of 'mother plants' which currently isn't included - propagation material includes, seeds, mother plants etc.</p>	<p>PC1.1 amended to read 'Identify and confirm propagation tasks, workplace procedure and specifications with supervisor'. Also amended in AHCMDC202 and AHCMDC203.</p> <p>PC2.3 amended to read 'Assist with taking cuttings from mother plant, sowing seed or preparing tissue culture as required.'</p> <p>PC2.4 amended to read 'Place cuttings, seed or tissue into prepared media to the required level as directed by supervisor'.</p> <p>Reference to mother plant also included in PE and KE.</p> <p>Care of mother plants is included in ACHMDC202</p>
<p>Industry Employer VIC</p>	<p>PC1.3 needs to include that tools need to be approved for use and checked for functionality.</p> <p>Carbon dioxide in PC2.7 should be moved to PC2.8 as part of environmental climate conditions. Also amend in KE</p> <p>Carbon dioxide is part of external climate requirements (along with light/temperature) and doesn't need to be referenced separately</p>	<p>PC1.3 amended to read 'Collect required tools, equipment and materials for the task, and check for approval and functionality.' Also, added in KE.</p> <p>PC2.7 amended to read, 'Assist with water and nutrient and requirements according to specifications' and</p> <p>2.8, 'Assist with temperature, lighting, carbon dioxide and humidity requirements according to specifications'.</p> <p>Reference to carbon dioxide in KE changed to 'environmental climate requirements'</p>

<p>Industry Employer QLD and Industry Association NAT</p>	<p>In PE, count and checks dot point – sometimes a count is required or other methods of ‘checking’ can be used. Should be changed to count and/or check</p> <p>PC2.7 and 2.8. Make clear differences between water/nutrient requirements and requirements to do with control of the external environment.</p> <p>Reference to mother plants needs to be included</p>	<p>PE dot point amended to ‘performed regular <i>counts and/or weight</i> checks of propagation material’</p> <p>PC2.7 amended to read, ‘Assist with water and nutrient and requirements according to specifications’ and</p> <p>2.8 ‘Assist with temperature, lighting, carbon dioxide and humidity requirements according to specifications’.</p> <p>Reference to carbon dioxide in KE moved to environmental climate requirements.</p> <p>PC2.3 amended to read ‘Assist with taking cuttings from mother plant, sowing seed or preparing tissue culture as required.’</p> <p>Reference to mother plant also included in PE and KE.</p>
<p>Industry Employer SA</p>	<p>Include a statement around ensuring having training/assessment in tasks before performing</p>	<p>PC1.1 amended to read ‘Identify and confirm propagation tasks, workplace procedures and specifications with supervisor’.</p> <p>Also amended in AHCMDC202 and AHCMDC203.</p> <p>PC2.4 amended to read ‘Place cuttings, seed or tissue into prepared media to required level as directed by supervisor’</p> <p>Completing this unit will allow individuals to be trained and assessed in this skill.</p>
<p><b>AHCMDC202 Assist with care and maintenance of medicinal cannabis</b></p>		
<p>RTO VIC</p>	<p>Carbon dioxide as a hazardous substance? No other issues</p>	<p>Referred this question to SME group. See following response;</p> <p>Carbon dioxide enrichment for greenhouses, et al, is usually in two forms:</p> <ol style="list-style-type: none"> <li>1. Bulk tanks of pure CO2 based on calculated annual or seasonal loads with tanks ranging from 45lt to 50tonne</li> <li>2. Waste product harvested from gas boiler systems that would normally exit via the flue to the atmosphere. Gas burner could be fueled by either natural gas or LPG</li> </ol> <p>In terms of hazards, we normally enrich to a level of 400ppm (0.04%) to 1,200ppm (0.12%) with a maximum of 1,500ppm (0.15%) and my understanding is that human fatality does not occur until +/- 100,000ppm, (10%), far above our enrichment levels but irrespective, this would be an impossible level to reach with our systems.</p>

Industry Employer VIC	Reference to Carbon dioxide in PC2.5 should be included as part of environmental climate conditions (could be included in PC 3.4)  Also amend in KE accordingly	Carbon dioxide removed from PC2.5 and PC3.4 which was amended to read 'Assist with monitoring water and nutrient and climate control levels according to specifications and report levels that are out of acceptable range'.  KE amended accordingly.
Industry Employer QLD, VIC and NSW	Include reference to mother plants (currently no content included in the units about care of 'mother plants' which are kept on-site and can be used for propagation purposes.  Relevant to units MDC202, 304 and 404.	Content regarding mother plants added to the units;  Include in the application field the statement, 'It includes the care and maintenance of mother plants that are kept in the vegetative stage'  PC2.1 amended to read, 'Identify and inspect medicinal cannabis plants, including mother plants, to be maintained and confirm quantity and weights with supervisor'  Addition of new PC 3.5 'Assist with monitoring growth, health and climate conditions for mother plants to ensure that they stay in their vegetative stage, and report abnormalities as required'.  Additions to KE includes:  <ul style="list-style-type: none"> <li>• trimming and training techniques, including techniques used for preserving mother plants and repotting techniques</li> <li>• different water and nutrient and requirements for vegetative, including mother plants, and flowering cycles</li> <li>• different climate requirements, including ideal target lighting intensity, carbon dioxide, temperature and humidity levels for vegetative, including mother plants, and flowering cycles.</li> </ul>
Industry Employer SA	Can non-medicinal cannabis be used to satisfy performance evidence requirements? For example, similar plants such as hemp?	Advice on the use of non-medicinal cannabis for providing evidence to demonstrate competency due to accessibility issues will be provided in the Companion Volume Implementation Guide.

<p>Validation Meeting Participants (Industry Employers VIC, NSW, QLD, SA and WA)</p>	<p>Application to include vegetative, flowering and care of mother plants (mother plants require slightly different requirements). Relevant to units MDC202, 304 and 404</p>	<p>Content regarding mother plants added to the units; Include in the application field the statement, 'It includes the care and maintenance of mother plants that are kept in the vegetative stage' PC2.1 amended to read, 'Identify and inspect medicinal cannabis plants, including mother plants, to be maintained and confirm quantity and weights with supervisor' Addition of new PC 3.5 'Assist with monitoring growth, health and climate conditions for mother plants to ensure that they stay in their vegetative stage, and report abnormalities as required'. Additions to KE includes:  <ul style="list-style-type: none"> <li>• trimming and training techniques, including techniques used for preserving mother plants and repotting techniques</li> <li>• different water and nutrient and requirements for vegetative, including mother plants, and flowering cycles</li> <li>• different climate requirements, including ideal target lighting intensity, carbon dioxide, temperature and humidity levels for vegetative, including mother plants, and flowering cycles.</li> </ul> </p>
<p>Industry RTO</p>	<p>Comment regarding what is weighed and how it will be weighed. Change 'plants' to 'plant material' against numeracy in Foundation Skills.</p>	<p>Inventory management, which includes the documentation of counts and weights during each process, is a regulatory requirement for a licensed site to protect against product recall and diversion. Foundation skills numeracy point now reads – 'Conduct simple counts and weight calculations of plant material'</p>
<p><b>AHCMDC203 Assist with harvest and pre-processing of medicinal cannabis</b></p>		
<p>Industry Employer QLD</p>	<p>PC 3.1 also important for propagation and maintenance. How do you assess two harvests?</p>	<p>3.1 'Comply with entry and exit procedures when moving in and out of the drying room according to workplace requirements' checked for inclusion in propagation and maintenance units where relevant. PE amended to assisting in one harvest. Now reads - there must be evidence that the individual has assisted with medicinal cannabis harvest and pre-processing tasks for at least one harvest.</p>

Industry Employer SA	<p>PC1.3 – individuals will need to check for functionality and/or approval to use tools and equipment</p> <p>Can non-medicinal cannabis be used to satisfy performance evidence requirements? For example, similar plants such as hemp?</p>	<p>PC1.3 amended to read 'Collect required tools, equipment and materials for the task, and check for approval and functionality.'</p> <p>Advice on the use of non-medicinal cannabis for providing evidence to demonstrate competency due to accessibility issues will be provided in the Companion Volume Implementation Guide.</p>
Industry Employer VIC	<p>Challenges with practical component (PE assisting with more than one harvest)</p>	<p>PE amended to assisting in one harvest. Now reads - there must be evidence that the individual has assisted with medicinal cannabis harvest and pre-processing tasks for at least one harvest.</p>
Validation Meeting Participants (Industry Employer VIC, NSW, QLD, SA and WA)	<p>Environmental Climate conditions must be monitored across all harvesting and pre-processing activities (including storage vaults). There will be different requirements across different types of pre-processing stages</p> <p>This is also relevant for 305</p>	<p>Added PC2.3 'Check climate control, including temperature, humidity and airflow levels according to specifications and report levels that are out of acceptable range'.</p> <p>Amended PE and KE to refer to required and ideal climate conditions for each of the harvesting and pre-processing processes. Also added to AHCMDC305.</p>
Industry RTO	<p>Comment questioning what is weighed and how it will be weighed?</p>	<p>Inventory management, which includes the documentation of counts and weights during each process, is a regulatory requirement for a licensed site to protect against product recall and diversion.</p>
<p><b>AHCMDC302 Apply regulatory and quality requirements to the production of medicinal cannabis</b></p>		
Industry Employer QLD	<p>Use term 'audit' in Element 4. Add to performance and knowledge evidence.</p>	<p>Element 4 relates to record keeping and reporting instances of deviation and non-compliance.</p> <p>Content relating to auditing is incorporated and better aligned to unit AHCMDC402 Monitor medicinal cannabis production for compliance and quality.</p>

Industry Employer SA	Need to incorporate audit involvement and behavior in this unit, including internal audit and external audit requirements	Content relating to exterior audit is included in PC1.3 'Identify roles and responsibility of authorities responsible for administering requirements' and KE – 'roles and functions of commonwealth government authorities responsible for administering the legislation, including record requirements'  Aspects of internal level auditing incorporated and better aligned to unit AHCMDC402 Monitor medicinal cannabis production for compliance and quality.
Validation Meeting (Industry Employers VIC, QLD, NSW, SA and WA)	Discussion around using the phrase 'Identify legislation and standards' (this relates to units 302 and 402)  Change to 'Identify relevant policies and procedures' rather than legislation because the regulatory team would identify the legislative side of things  Use 'Identify' for 302 and 'identify and access' for 402	This unit is related to individuals who work in a highly regulated environment and are required to have an awareness of the legislation, regulations and quality standards that impact their work.  However, they are not required to have in-depth knowledge of the contents of the legislation but understand the impact it has on the organisation's arrangements.  In this context, amending PC1.1 to leave out 'legislation, regulations' would reduce the unit's outcomes.  Resolution is to leave PC1.1 as 'Identify legislation, regulations and standards relevant to the production of medicinal cannabis' with the interpretation that individuals are not required to have in-depth knowledge of the contents of the legislation but are required to understand the impact it has on the organisation's arrangements.
<b>AHCMDC303 Undertake propagation of medicinal cannabis</b>		
RTO Victoria	Is carbon dioxide classed as a hazardous substance?  No other issues with this unit.	Carbon dioxide used in greenhouses not considered a hazardous substance. See note against AHCMDC202.

<p>Industry Employer VIC</p>	<p>References to carbon dioxide in PC2.5 should be removed and included in 2.6 as part of surrounding external environment (light, humidity etc.) and incorporated as part of 'environmental climate conditions'.</p> <p>Co2 (carbon dioxide) should be included but not with water and nutrients PC 2.7 and 2.8)</p> <p>Carbon dioxide is a climate characteristic - sits under Environmental Climate Conditions - check across all units - includes light, temperature and carbon dioxide</p>	<p>PC2.5 amended to read, 'Check water and nutrient and requirements according to specifications and adjust manually or use control system to maintain to required levels'</p> <p>2.6 amended to read 'Check temperature, lighting, carbon dioxide and humidity according to specifications and use control system to adjust and maintain to required levels'.</p> <p>Reference to carbon dioxide in KE incorporated as part of references to 'environmental climate requirements'.</p>
<p>Industry Employer QLD</p>	<p>In PE, add and/or to count and checks dot point. Include reference to mother plants</p>	<p>"and/or" referring to counts and weights of propagation material added to PC2.1 and 3.1.</p> <p>2.1 Identify, check and record type, quantity <i>and/or</i> weight of propagation material to be used against specifications</p> <p>3.1 Calculate and record quantity <i>and/or</i> weight of propagation material to be monitored</p> <p>Reference to mother plant also included in PE and KE. Care of mother plants is included in ACHMDC304.</p>
<p>Validation Meeting Participants (Industry Employer VIC, NSW, QLD, SA and WA)</p>	<p>1.3 Collect approved required tools and equipment (tools have to be calibrated, clean and fit for use)</p> <p>Possibly covered under 1.5. but need to make sure it is clear that tools are to be checked prior to use</p> <p>In KE (second last point) - add 'including operational check and approval'</p>	<p>PC1.3 amended to read – 'Prepare self and required approved tools, equipment and materials, including personal protective equipment, according to hygiene and sanitation and health and safety procedures'</p> <p>KE (second last point) now reads function, operation and maintenance of tools and equipment used during the propagation of medicinal cannabis, including operational checks.</p>

Industry RTO	Minor edits required to application field - Replace 'create' with 'establish' and correct spelling of propagation.	Edits made to application field as outlined below:  Application - This unit of competency describes the skills and knowledge required to undertake the propagation of medicinal cannabis according to the propagation plan. It requires the ability to prepare for propagation activities, apply common propagation techniques to establish cannabis plants, monitor and control health and environmental climate conditions of the propagation material, and carry out all recording and reporting requirements throughout the propagation cycle according to regulatory and quality requirements.
<b>AHCMDC304 Undertake care and maintenance of medicinal cannabis</b>		
RTO Employer Victoria	Is Carbon dioxide classed as a hazardous substance?  No other issues with this unit	Carbon dioxide used in greenhouses not considered a hazardous substance. See note against AHCMDC202.
Industry Employer VIC	Carbon dioxide in PC2.8 should be removed and included in PC 3.4 as part of monitoring of external environment (light, temperature and humidity) should be moved and as part of environmental climate conditions. Also amend in KE to incorporate as part of environmental climate conditions  Include reference to mother plants in application and KE.	PC2.8 amended to read, '2.8 Check water and nutrient requirements after pruning and potting, and adjust manually or use control systems to maintain to required levels'  PC3.4 amended to read 'Check climate control systems, including temperature, lighting, carbon dioxide and humidity levels according to specification and adjust as required'.  Reference to carbon dioxide in KE incorporated be included as 'environmental climate requirements'
Industry Employer QLD	Include reference to mother plants in application and KE.	Reference to mother plants included in application field – 'This unit of competency describes the skills and knowledge required to care for and maintain medicinal cannabis plants during their vegetative and flowering cycles according to the care and maintenance plan. It includes the care and maintenance of mother plants that are kept in the vegetative stage'  New PC2.5 included to read - 'Use trimming and shaping techniques to preserve mother plants in the vegetative stage'  References to mother plants added to PE and KE



Industry Employer SA	Can non-medicinal cannabis be used to satisfy performance evidence requirements? For example, substitute with similar plants such as hemp	Advice on the use of non-medicinal cannabis for providing evidence to demonstrate competency due to accessibility issues will be provided in the Companion Volume Implementation Guide.
<b>AHCMDC305 Undertake harvest and pre-processing of medicinal cannabis</b>		
RTO Victoria	<p>Does this include health and check for disease? Maybe the plant health/diseased material check should be pre-harvest.</p> <p>In Assessment Conditions - Where is knowledge component of this, can be in specs and plans but not explicit. The PCs mention checking with the supervisor pre-harvest but not identifying plants ready for harvest.</p>	<p>PC2.2 now reads - 'Check plant health prior to commencing harvesting tasks, including any signs of disease or pests and report abnormalities or presence of disease or pests'</p> <p>Dot point in Assessment Conditions amended from 'plants ready for harvest' to 'plants for harvesting'.</p> <p>Reference to 'making a judgement about when to harvest' removed from PC and Performance Evidence.</p>
<b>AHCMDC401 Apply security measures for medicinal cannabis</b>		
Industry Employer VIC	<p>Refer to risk assessment in Element 1</p> <p>Individuals at this level would be required to assess security risks</p>	<p>PC1.3 amended to read, 'Assess risks and identify control measures to minimise the risk of diversion'.</p> <p>Also added to PE accordingly;</p> <p>Identified information from organisation and government on:</p> <ul style="list-style-type: none"> <li>• security threats to the organisation</li> <li>• <i>control measures that can minimise the risk of diversion</i></li> </ul>
Industry Employer QLD	<p>Refer to all cannabis not just waste to PC2.3.</p> <p>Refer to transfer within site</p>	<p>Physical security of cannabis is addressed in PC2.1.and has been extended to read 'Apply control measures related to the physical security of cannabis, including transfer within site'.</p>

<p>Validation meeting Participants (Industry Employer VIC, SA, QLD, NSW and WA)</p>	<p>Individuals at this level would be required to participate in security risk assessments  Use the term Risk Assessment</p>	<p>PC1.3 amended to read, 'Assess risks and identify control measures to minimise the risk of diversion'.  Also added to PE accordingly;  Identified information from organisation and government on:</p> <ul style="list-style-type: none"> <li>• security threats to the organisation</li> <li>• <i>control measures that can minimise the risk of diversion</i></li> </ul>
<p><b>AHCMDC402 Monitor medicinal cannabis production for compliance and quality</b></p>		
<p>Industry Employer QLD</p>	<p>Add GACP/GMP as referred in KE/PE to elements. "Good Practice Standards"</p>	<p>Good Practice Standards added to Element 2 and PE  Element 2. Implement and monitor Good Practice Standards for production of medicinal cannabis  PE now includes - reviewed workplace procedures for compliance with legal and regulatory requirements and elements of Good Practices Standards</p>
<p>Industry Employer SA</p>	<p>Individuals would be required to access the relevant organisation's policies and procedures (rather than directly access the legislation)  Must revise ground level manager responsibilities, not responsible for interpreting legislation/regulations, that's your internal reg. team's role</p>	<p>This unit is related to individuals at the supervisory or managerial level and who are responsible for ensuring workplace operations comply with the regulatory and quality requirements. This requires knowledge of legislation impacting the production of medicinal cannabis.  Amending PC1.1 to remove 'legislation, regulations' would reduce the unit's outcomes.  PC1.1 to remain as 'Identify and access current legislation, regulations, standards and regulatory body information relevant to licensed cultivators and manufacturers of medicinal cannabis'</p>

Industry Assoc NAT and Industry Employer VIC, QLD and SA)	Refer to 'quality management systems rather than quality systems at this level of responsibility  4th dot point in KE - Relates to quality  Change to quality management systems	'quality systems' amended to 'quality management systems' in KE
Industry RTO NAT	In Assessment Conditions, won't always have contractors - in fact might rarely/given the nature of the industry - I'd suggest changing 'and' to 'or'	'Contractors may be used for transportation, disposal of waste etc.  'In ACs, 'staff and contractors' amended to 'staff and/or contractors'
<b>AHCMDC403 Plan and implement a propagation program for medicinal cannabis</b>		
RTO VIC	Is carbon dioxide as a hazardous substance?  No other issues with this unit.	Carbon dioxide used in greenhouses is not considered a hazardous substance.  See note against AHCMDC202
Industry Employer QLD and VIC	Remove 'carbon dioxide' from PC2.5 and KE (and include under 'environmental climate conditions')  Need to add reference to 'mothers' as source material	'Carbon dioxide' removed from PC2.5 and KE - now included in references to 'environmental conditions'  Mother plants added to KE dot point which now reads 'propagation material needs to meet production targets, which may include mother plants, seeds or tissue culture '
Industry Employer SA	Can non-medicinal cannabis be used to satisfy performance evidence requirements? For example, similar plants such as hemp	This unit is related to individuals at the supervisory or managerial level and who are responsible for managing and monitoring propagation processes on a licensed medicinal cannabis production site. Performance evidence includes the development and monitoring of a propagation plan.  Performance evidence includes the development and monitoring of a care and maintenance plan so not required to work directly with plants (compared to level II and III units).
Validation Workshop Participants (Industry Employer VIC, NSW, QLD, WA and SA)	Need to include reference to 'mother plants'  For example, in developing the plan, have to make sure have enough mother plants and source material.	Reference to mother plants added to KE dot point 'propagation material needs to meet production targets, which may include mother plants, seeds or tissue culture '

Industry RTO NAT	In Assessment Conditions, what does 'Applications' refer to? Word Excel?	Applications in ACs clarified and broadened to include "software applications/workplace documentation for developing plans and schedules".  Also amended in AHCMDC404 and AHCMDC405.
<b>AHCMDC404 Plan and implement a care and maintenance program for medicinal cannabis</b>		
RTO VIC	Is carbon dioxide as a hazardous substance? No other issues.	Carbon dioxide used in greenhouses not considered a hazardous substance. See note against AHCMDC202
Industry Employer QLD and VIC	Include reference to mother plants in application and KE fields.	Statement added to application field to read - 'The program may include the care and maintenance of mother plants that are kept in the vegetative stage and used for cuttings and clones'  Reference to the care and maintenance of mother plants also included in KE. 'care and maintenance requirements, including water and nutrient requirements and environmental climate conditions for vegetative and flowering cycles, and for preserving mother plants'
Industry Employer SA	Can non-medicinal cannabis be used to satisfy performance evidence requirements? For example, similar plants such as hemp.	This unit is related to individuals at the supervisory or managerial level and who are responsible for managing and monitoring care and maintenance processes on a licensed medicinal cannabis production site.  Performance evidence includes the development and monitoring of a care and maintenance plan so not required to work directly with plants (compared to level II and III units).
<b>AHCMDC405 Plan and implement a harvest and pre-processing program for medicinal cannabis</b>		
Industry Employer QLD	How to complete harvest? What about preparing samples? This is required for testing and should also be undertaken for vegetative, flowering and other units related to cultivation and production of the plant.	Determining when to complete harvest is covered:  PC1.2 'Determine harvest and pre-processing requirements, including optimum harvest time based on product specifications and implementation of Good Manufacturing Practices ' and;  KE - 'determining when to harvest for best quality, yield and based on required active ingredient'.  Sampling covered in AHCMDC303, 304 and 305.

<b>Units General Feedback (across all 13 units)</b>		
RTO VIC	<p>A comment on the units. Some of the Performance Evidence points are close to repeating the PCs when the PE already contains the statement that an individual demonstrating competency must satisfy all of the elements and performance criteria in this unit.</p> <p>One question for the experts around the use of carbon dioxide gas. I assume that CO2 bottled gas is used to enrich the greenhouse atmosphere. Is CO2 classified as a hazardous substance and should hazardous substances be specified in the KE for the units indicated in the table above? Only manual handling is mentioned</p>	<p>All units reviewed for PE dot points repeating PCs, and amendments made to address duplication</p> <p>Carbon dioxide used in greenhouses not considered a hazardous substance. Refer to note against AHCMDC202</p>
Question referred to SME group from Content Writer for clarification and Response provided by SME group participants	Should 'tissue culture' method of propagation be included in propagation specific units. Feedback from an industry stakeholder is that it should be separated. Is there a need to create a separate unit to address a different propagation method?	Response/Resolution - Content regarding tissue culture has been retained in these units as one of the propagation methods used in industry. The qualification includes a number of imported elective units to further expand the skills and knowledge required to support the tissue culture method.
Question referred to SME group from Content Writer for clarification and Response provided by SME group participants	What is the correct and most commonly used industry terminology: 'growing and flowering cycles' or 'vegetative and flowering cycles'? Feedback was provided from an industry stakeholder that it should be 'vegetative and flowering cycles'. Also 'growing systems' vs 'cultivation environments'.	Response/Resolution - The term 'vegetative and flowering cycles' adopted as the accepted industry terminology in the three care and maintenance-based units. The term 'growing systems' to be retained' and 'environmental' added to climate conditions.

<p>Question referred to SME group from Content Writer for clarification and Response provided by SME group participants</p>	<p>For assessment purposes, how many plants make up a crop? Or how many plants does the individual need to work on to demonstrate they are competent in each of the areas of propagation, care and maintenance and harvest and pre-processing?</p>	<p>Response/Resolution - Performance Evidence in Certificate II growing and harvesting units requires assisting with tasks for at least two propagation, caring and maintenance or harvesting and pre-processing cycles. For Certificate III units, performance evidence requires propagation material to produce six plants/care and maintenance of six plants/harvest and pre-processing of six plants for at least two propagation/vegetative and flowering/harvest and pre-processing cycles.</p>
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## Summary of Feedback on Draft Skill Sets

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO QLD	Proposed 4 skill sets – ‘would be great for someone doing Cert III in Ag’	No change required. Supportive of proposed skill sets.
Industry Employer /RTO Victoria	This skill set very useful and applicable for entrants to the industry ( <i>Induction to Work in the Medicinal Cannabis Industry Skill Set</i> )	No change required. Supportive of proposed skill set.
Industry Association WA	<p><i>Induction to Work in the Medicinal Cannabis Industry Skill Set</i></p> <p>Are these 2 units really necessary? Combine into one!</p>	<p>Feedback considered and referred to wider SME group. Advice provided included:</p> <p>The two units address different areas of regulatory requirements – AHCMDC301 for the physical security of medicinal cannabis and AHCMDC302 for the production and quality of medicinal cannabis.</p>
Industry Association WA	<p><i>Induction to Work in the Medicinal Cannabis Industry Skill Set.</i></p> <p>Perhaps ‘Introduction’?</p> <p>If the word 'induction' is used, state governments may be reluctant to fund it as induction is an employer responsibility.</p>	<p>Feedback considered and extra research undertaken found there are currently 16 skill sets on TGA that include the word ‘induction’ in their title.</p> <p>Industry feedback indicated this particular skill set would be very suitable for participants entering the industry from other horticultural sectors. Leave ‘Induction’ in title as skill set funding is determined by state-based models</p>