

Stakeholder Feedback Report - Drafts Available

May 2022

Draft qualifications, units of competency and skill sets for the Permaculture Project were made available on the Skills Impact website for stakeholder review from 14 February to 30 March 2022. Please visit the website to view a full list of the documents that were submitted for consultation during this phase.

Feedback was received from a variety of stakeholders around the country via email, the Skills Impact Feedback Hub, webinars, phone and email, as follows:

	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	National
Government Federal									
Government State									
Government Local									
Employer									
Peak Industry Body									
IRC Representative									
Regulator									
Training Board									
Registered Training Organisation (RTO)									
Union									
State Training Authority (STA)									
Other									

Note: Feedback has been sought from stakeholders across all states and territories who are working within the permaculture industry sector. Further targeted consultation and follow-up with key stakeholders in the ACT will be undertaken as part of the next stage of the project.

Below is a summary of the feedback raised for the draft qualifications, skill sets and units reviewed for the project at the Drafts Available stage, and how these 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 (SMEWG) process. Resolutions are constructed to consider the needs and views of stakeholders to the extent possible, and to comply with the Standards for Training Packages 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, SMEWG – Subject Matter Expert Working Group, AHC – Agriculture, AQF – Australian Qualification Framework

Report Index

Qualification Feedback

Skill Set Feedback

Units of Competency Feedback

General Feedback

Component Index

Cert II	AHC217XX	Certificate II in Permaculture
Cert III	AHC33816	Certificate III in Permaculture
Cert IV	AHC42116	Certificate IV in Permaculture
Diploma	AHC52116	Diploma of Permaculture

Organisation Type: State Government

Coverage: WA

Stakeholder Comments:

Title needs reviewing of unit AHCWHS2X1 Participate in workplace health and safety processes in the Cert II in Permaculture

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

This particular unit is being reviewed in another project (see Ag & Horticulture Core Skills project). All codes will be checked in all qualifications prior to submission, including those being reviewed in other AHC projects.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Agree that sole traders etc are CIII level.

But also agree that PER210 should have been kept.

I think CII can act as a good 'taster' level before candidates commit to longer courses, so needs to cover as many aspects of PC as possible albeit in an limited way

Consideration and Proposed Resolution: Noted

Thank you for your feedback

Note: PER210 was deleted from the AHC Training Package due to low enrolments, as part of activities to meet Skills Ministers' priority of removing training products with low or no enrolments, as agreed by the AISC. This activity took place prior to this project.

SMEWG advice is that the social permaculture aspects from AHCPER210 should be embedded in existing permaculture units of competency where relevant, and this has been done. For example see AHCPER201 Work effectively in permaculture (which is a core unit).

Organisation Type: Employer

Coverage: National

Stakeholder Comments:

Core units to reflect core knowledge and skill sets for working as a Permaculturist. This is not achieved here.

Consideration and Proposed Resolution: Noted

The SME group supports the core units and packaging rules for this qualification.

Note: The core units and packaging rules are essentially unchanged compared to the current version. The only difference is a different WHS unit has be propped to be included in the core in place of the current WHS unit.

The SME group have been asked to confirm their support for the core and packaging rules for this qualification and they have done so.

Organisation Type: Employer

Coverage: National

Stakeholder Comments:

Core units to reflect core knowledge and skill sets for working as a Permaculturist. This is not achieved here.

Consideration and Proposed Resolution: Noted

Thank you for your feedback. The SME group has provided support for core units and packaging rules for this qualification. Note, The core units and packaging rules are essentially unchanged from the current version The only change is a different WHS unit is proposed to be included in the core compared to current version.

SME group have been asked to confirm whether or not the packaging rules and core units should remain the same and they have confirmed that this should be the case.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Re: Core unit AHCPER4X1 Develop recommendation for integrated plant and animal systems
Will we need to assess this at a Cert IV level in a Cert III course. Not sure I understand how this works

Consideration and Proposed Resolution: Noted

Thank you for your feedback.
Standards for RTOs require units of competency be assessed according to the Assessment Requirements. RTOs also need to ensure assessment is contextualised to meet the needs of the learner cohort and any specific industry or workplace requirements; this being the impetus for any 'level' at which a unit may be assessed.
Note that units of competency do not have an AQF alignment. In unit codes, the first number loosely aligns to the AQF only in so much that it helps to describe the typical depth and complexity of the unit itself.

Organisation Type: Registered Training Organisation

Coverage: WA

Stakeholder Comments:

Social permaculture can be included in 301, although I think it's useful to have a unit dedicated to social permaculture

Consideration and Proposed Resolution: Noted

Thank you for your feedback
SMEWG advise that social permaculture is better embedded into existing units (including 301) instead of creating a new unit.

Organisation Type: Registered Training Organisation

Coverage: WA

Stakeholder Comments:

RE: Unit PER315
I do think this is above the AQF level, and ought to be a cert IV unit. But if it stays at level III, we need a social permaculture unit at level two. The idea being to build on previous knowledge. Normally students will learn about concepts and develop the skills at level 3 and then design and implement programs and plans at level 4.

Consideration and Proposed Resolution: Noted

Thank you for your feedback
Whilst units of competency do not have an AQF alignment, the outcomes of PER315 Coordinate community projects most closely align to a Certificate III. As such the unit code will not change.
SMEWG advise that social permaculture should be embedded in existing units, including level 2 units (AHCPER201 Work effectively in permaculture, for example), which has been done.

Organisation Type: Registered Training Organisation

Coverage: VIC

Stakeholder Comments:

Qualification Description - Question the apparent limitation of this job role as 'co-ordinators of permaculture systems'. Does not seem to fit with the Permaculture Farm Worker suggested two paragraphs down. Could it be for a general vocational outcome in permaculture production?

AHCPER4x1 - Suggest the inclusion of the AQF4 coded unit as a core may cause issues for some learner enrolled into a certificate III level.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Amended description to operator and modified job roles to include Permaculture Systems Coordinator as a specified role.

Regarding the inclusion of AHCPER4X1 in the core of the qualification, it is not unusual for units with a higher or lower indicative AQF identifier in the code to be included in the core of a qualification. The SMWEG advise that the skills and knowledge described in this unit of competency are considered essential to the job roles obtained through this qualification, and as such the unit needs to be in the core. This inclusion in the core does not impact the over AQF alignment of the qualification, which remains at a Certificate III.

Organisation Type: Registered Training Organisation

Coverage: VIC

Stakeholder Comments:

Packaging Rules - Under the rules you cannot select both Group A design units. Is there a rationale?

Mapping - Check mapping for new code and release no.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Reviewed packaging rules and modified to clarify selection of design units.

Mapping has also been corrected - this qualification will receive a new code to reflect the changes made during this project.

Organisation Type: Peak Industry Body

Coverage: National

Stakeholder Comments:

Diploma is about larger community project. E.g. eco-villages and schools. More than just what the client/owner wants. It is looking at feasibility and implementation on the one site.

- Check PER509 includes aspects of Permaculture Design.
- Could more electives be included in the Diploma?
- Look to ensure that regenerative agriculture and controlled traffic farming are covered
- Include ORG units in PER quals

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

- PER509 unit has been proposed for deletion and is no longer included in this qualification. CPPSSI5065 is a design unit that can be delivered in a permaculture context, and this has been added to the qualification instead.
- Additional units to be added to the elective grouping will be the focus of questions at upcoming validation meetings.
- Regenerative Agriculture and CTF farming practices have been included in the KE where appropriate for PER and ORG units.
- ORG units have been included in the elective banks of all qualifications

Organisation Type: Registered Training Organisation

Coverage: VIC

Stakeholder Comments:

Qualification description - Question these sustainability roles when the core does not specifically include a dedicated sustainability unit. Some inclusion of sustainability in KE of one core AQF 4 unit only.

AHCPER603 - Including an AQF6 unit in the core may disadvantage some learners enrolled into diploma level.

Consideration and Proposed Resolution: Noted

Thank you for your feedback

Principles of sustainable living is embedded in the principles of Permaculture and its ethics and practices. As a result, specific units in sustainability are not required

Regarding the inclusion of AHCPER603 in the core of the qualification, it is not unusual for units with a higher or lower indicative AQF identifier in the code to be included in the core of a qualification. The SMWEG advise that the skills and knowledge described in this unit of competency are considered essential to the job roles obtained through this qualification, and as such the unit needs to be in the core. This inclusion in the core does not impact the over AQF alignment of the qualification, which remains at a Diploma.

Component Index

AHCSS00048	Permaculture Demonstrator Skill Set
AHCSSXXX06	Permaculture Backyard Skill Set
AHCSSXXX09	Maintain Permaculture Systems Skill Set
AHCSSXXX12	Permaculture Fundamentals Skill Set
AHCSSXXX14	Permaculture Water Systems Skill Set
AHCSSXXX17	Permaculture Designer Skill Set
AHCSSXXX18	Permaculture Community Development Skill Set

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

While I agree that AHCPER303 can be problematic for a short course - I don't think AHCPER302 is necessarily the best option as it is not a 'hands on' practical unit. I would suggest giving the option of either AHCPER303 or AHCPER3X3 Establish a PC system - that way the delivery can be tailored to the venue ie existing system or new system, but the candidates will still have a practical skill set

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Most stakeholders supported the removal of AHCPER303, and the inclusion of AHCPER302 (now coded AHCPER4X1) instead. This will be discussed further during the Validation process.

Organisation Type: Employer

Coverage: WA

Stakeholder Comments:

I agree that AHCPER303 needs to be swapped with AHCPER302.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Changed AHCPER303 for revised unit AHCPER4X1 (note PER4X1 is revised PER302) as suggested.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Agree - AHCWRK311 doesn't really fit. As is it skips from site assessment to establishment with no design, planning etc in between.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Replaced AHCWRK311 with AHCPER303 Maintain integrated plant and animal systems and AHCPER3X7 Coordinate preparation and storage of produce from a permaculture system which should address this issue.

Organisation Type: Employer

Coverage: WA

Stakeholder Comments:

AHCPER313 Coordinate preparation and storage of permaculture products or another harvest unit would fit very well into this skill set. I think better than AHCWRK311 Conduct site inspections

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Replaced AHCWRK311 with AHCPER3X7 (replacement for AHCPER313) Coordinate preparation and storage of produce from a permaculture system added as suggested.

AHCPER303 Maintain integrated plant and animal systems has also been added based on additional stakeholder feedback.

Organisation Type: State Government

Coverage: WA

Stakeholder Comments:

AHCPER319 Test, improve and maintain soil in a permaculture system - Unit title needs reviewing. Should be AHCPER319 Test, improve and maintain healthy soil in a permaculture system.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Corrected unit title in AHCSSXXX09.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Yes, tricky to know how this would be useful - its almost but not quite design (as is appropriate at CIII level), but will this be of interest to anyone? Hard to deliver enough content to cover all this in a short enough time to make this a useful short course

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

This skill set was created based on feedback and on suggestion of the SMEWG, who see this as a useful skill set to have.

Organisation Type: State Government

Coverage: WA

Stakeholder Comments:

AHCPER3X1 Communicate permaculture system plans to client - Unit title needs reviewing. Should be AHCPER3X1 Communicate permaculture system principles to client.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Corrected unit title in AHCSSXXX12.

Organisation Type: Peak Industry Body

Coverage: National

Stakeholder Comments:

Add PER314 Read and Interpret.. to Permaculture Water Systems Skill Set

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

AHCPER314 Read and interpret property maps and plans added as suggested.

AHCPER319 Test, improve and maintain healthy soil in a permaculture system also added based on other stakeholder feedback.

Organisation Type: Employer

Coverage: WA

Stakeholder Comments:

I agree that it needs one or even two other units to make sense. The mapping unit (AHCPER314) and soils (AHCPER319) seem obvious choices.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Added two units to skill set as recommended

- AHCPER314 Read and interpret property maps and plans
- AHCPER319 Test, improve and maintain healthy soil in a permaculture system

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

I agree with comment 1 - useful to have something that can be assessed in parallel with a PDC
And re comment 2, I think these units are enough (but maybe include 413)

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Added AHCPER4X5 Investigate and recommend biological elements for a permaculture system into skill set
(Note PER413 is now PER4X5). The addition of this unit will be discussed further during Validation.

Organisation Type: Employer

Coverage: WA

Stakeholder Comments:

RE: question regarding suitability of listed units and their outcomes.

I agree. These make sense as a set, but a person having only these units will not be a designer without at the very least further knowledge on selecting plants and animals and soil.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Note, other stakeholders have suggested the addition of AHCPER4X5 Investigate and recommend biological elements for a permaculture system into skill set. The addition of this unit will be discussed further during Validation.

Organisation Type: State Government

Coverage: WA

Stakeholder Comments:

AHCPER410 Recommend approaches for sustainable community and bioregional development programs - Unit title needs reviewing.
Should be AHCPER410 Recommend approaches for sustainable community and bioregional development

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Corrected unit title in AHCSSXXX18.

Component Index

AHCPER208	Harvest permaculture crops
AHCPER2X5	Harvest crops in a permaculture system
AHCPER2X7	Use and maintain basic hand tools and equipment for garden and farm
AHCPER303	Maintain integrated plant and animal systems
AHCPER305	Implement crop maintenance and harvesting programs for permaculture systems
AHCPER319	Test, improve and maintain healthy soil in a permaculture system
AHCPER320	Manage plant pests, diseases and disorders in a permaculture system
AHCPER3X1	Communicate permaculture system principles to client
AHCPER3X2	Use characteristics of plant resilience in a permaculture system
AHCPER3X3	Establish a permaculture system
AHCPER3X4	Install and maintain permaculture water systems
AHCPER3X5	Install structures for permaculture systems
AHCPER3X6	Establish organic garden and orchard systems
AHCPER3X8	Coordinate community projects
AHCPER3X9	Coordinate propagation activities for a permaculture system
AHCPER3X10	Mitigate plant pests, diseases and disorders in a permaculture system
AHCPER403	Design an urban permaculture system
AHCPER409	Manage a permaculture seed bank
AHCPER4X1	Develop recommendations for integrated plant and animal systems
AHCPER4X3	Select 'appropriate technology' for a permaculture system
AHCPER502	Design an integrated permaculture system
AHCPER511	Facilitate participatory planning and learning activities
AHCPER6X1	Develop a strategic plan for a permaculture project or enterprise

Organisation Type: Registered Training Organisation

Coverage: WA

Stakeholder Comments:

I'm briefly going to respond to comments, In particular " Respondent sees much duplication with existing AHC units. for example, AHCPER208 and AHCPHT215, and doesn't understand why harvesting permaculture crops is different to other crops".

I'm assuming the person was referring to AHCPHT214 - Support horticultural crop harvesting which was being compared to AHCPER208 - Harvest permaculture crops.

The AHCPER208 knowledge assessments that requires the learner to demonstrate knowledge of permaculture principles that relates to harvesting as opposed to principles and practices for harvesting horticultural crops. The 2 units have totally different paradigms/principles and practice in my view. The plants being harvested might be the same but the way they are harvested maybe different. Permaculture may want to deliberately leave some fruits on the tree/shrub/vine for enhancing habitat while horticulture is clean harvesting to discourage pests/diseases infestation say in a monoculture environment. Therefore I would suggest that they are kept separate.

Consideration and Proposed Resolution: Noted

Thank you for your feedback and clarification on why the Permaculture units do not duplicate others in the system. SMEWG agrees with these comments and has advised that Permaculture have significantly different types of cropping structures compared to traditional farming practices.

Organisation Type: Registered Training Organisation

Coverage: WA

Stakeholder Comments:

There is a point of difference, in that often we utilise crops that are not valued by conventional horticulture

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

This comment was made in response to another stakeholder comment questioning how harvesting a permaculture crop would be different from harvesting any other type of crop. The SMEWG has also advised that permaculture have significantly different types of cropping structures compared to traditional farming practices and therefore this unit does not duplicate existing content.

Organisation Type: Training Board

Coverage: WA

Stakeholder Comments:

This Unit is substantively the same as AHCPHT214. Permaculture crops are not different to other crops. Remove duplication.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

SMEWG has advised that Permaculture have significantly different types of cropping structures compared to traditional farming practices and therefore does not duplicate existing content.

Organisation Type: Employer

Coverage: National

Stakeholder Comments:

There is no permaculture crops. It is the same crop but a different method of planting and different priorities compared to comparable units in agriculture/ horticulture units. This must be reflected

Consideration and Proposed Resolution: Noted

Thank you for your feedback

Different methods of planting and different priorities for permaculture crops (compared to comparable units in agriculture/horticulture units) are covered in the PER units.

For example, planting, harvesting, storage and treatment of crops used in a permaculture system is covered in units AHC2XX Harvest, treat and store seed and AHC2XX Prepare and store products from a permaculture system and AHC2XX Plant and maintain crops in a permaculture system.

Organisation Type: Registered Training Organisation

Coverage: WA

Stakeholder Comments:

Ref Assessment Conditions (AC) dot point 2

This doesn't make sense, will be confusing to lecturers delivering this unit.

Consideration and Proposed Resolution: Noted

Thank you for your feedback

The Assessment Conditions describe the conditions under which the assessment must take place. The 'resources and materials' list describes the required resources that trainers and assessors must have access to for assessments to be performed.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Re: comment from another stakeholder regarding potential duplication of content in units.

Yes, there can be a big difference - permaculture crops are often perennial and/or naturalised and smaller scale, so quite different techniques

Consideration and Proposed Resolution: Noted

Thank you for your feedback and clarification on how harvesting a permaculture crop would be different from harvesting any other type of crop.

Organisation Type: State Government

Coverage: WA

Stakeholder Comments:

Re: Performance Criteria 3 - Bullet point numbering needs reviewing.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Numbering corrected for PC in PER2X7.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref to KE dot Point 2.

'principles of sus hort practices' makes assessment very tricky! Suggest leave it out.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Deleted reference to principles of sustainable horticultural practices in KE.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref to KE dot point 5 maintaining tools and equipment

Remove specific details

Suggest changing all 'including' to 'such as' in these lists

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the 2nd level bullets have been removed as they refer to examples.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref KE dot point 1 sub point 3

Need to remove duck-rice systems, this is way too specialised. Duck orchard system is more realistic.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Deleted reference to 'Duck-rice systems' KE dot point 1.3 as suggested.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 1 sub point 3

Change 'including' to 'such as' (then rice-duck systems etc can stay)

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the 2nd level bullets have been removed as they refer to examples.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot points 6 to 9

This unit has always needed a lot of written knowledge questions to assess - consider removing some of these requirements (as they are mostly covered in other units anyway)

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the 2nd level bullets have been removed as they refer to examples.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref PE dot point 5 - instructed and coordinated work team

This seems out of place - nothing like this mentioned in the Elements/Performance criteria and not needed at Cert III level

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

PE dot point 5 - relates to PC 3.2.

PE has been edited for clarification.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 3 all sub points

Change 'including' to 'such as'

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref PE dot point 4

Most tests don't look at biota - leave off 'from test results'

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Amended PE - removed 'from test results'

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 3 permaculture and organic systems control methods including:
Change to "such as"

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the 2nd level bullets have been removed as they refer to examples.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref PE introductory statement

Might be good to be more specific about what is needed here - often permaculture systems are relatively pest-free making it difficult to get enough issues for assessment. Would maintaining a healthy PC system with no issues cover the requirements for the unit as long as the KE was also covered?

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

The introductory statement covers the general unit outcome. The dot points that follow are more specific on what the individual must demonstrate to be deemed competent. Dot point 1. is a critical aspect of identifying possible pests and diseases that can affect permaculture crops and is a foundation skill, so must be assessed.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE sub point examples of dot point 3 - similarities and differences between other land use and management practices,

Should be 'such as' rather than 'including' as these are just examples of possible systems to explore.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the SMEWG agrees that the 2nd level dot points of KE 3 are only examples, and as such have been removed to ensure the bullet is not limited to the examples.

Content of units of competency must only include that which is essential to describe the skills and knowledge required of the job task. Wording 'such as' is therefore to be avoided as it provides suggestions/advice.

Based on the advice that not all sub-bullets are required in KE dot point 3, these sub-bullets have been removed to allow for broader context.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE Dot point 2 - Reading and interpreting plans and specifications...

AHCPER301 expected candidates to be able to understand the different ways the things in the dotpoints are managed in different systems ie permaculture compared to others. In this unit it seems they only need to understand it in terms of an existing plan. I feel very uncomfortable about this change!

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

The individual must have a broad range of skills and knowledge required to apply to whatever context provided, not just one design. The dot points relate to skills for interpreting plans and specifications for permaculture systems possible for a site. However, candidates must also "Contrast and compile information on permaculture systems for stakeholders information" (Element 3). Therefore, more than one site would be required for contrasts to be made.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

The scope of this new unit is reduced from the AHCPER301 - now the contrast only needs to be for the site rather than more general principles. I think this narrows it down too much.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

The work outcome for this unit is to communicate a design for a site to a client or stakeholders. In order to do this the individual must have a solid understanding in permaculture principles, to interpret the design for any site. The assessment requirements outlines the broad performance and understanding required for this unit.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

I disagree that this update makes the unit broader. I found AHCPER301 very useful for introducing a range of permaculture concepts - but this new version is just based on one site.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

The work outcome for this unit is to communicate a design for a site to a client or stakeholders. In order to do this the individual must have a solid understanding in permaculture principles, to interpret the design for any site. The assessment requirements outlines the broad performance and understanding required for this unit.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

This makes it a tricky unit to assess - it looks like the candidates already need to have access to a site design and/or planning documents, but they are not expected to design themselves at this level - but then they are meant to communicate the options to the client. Surely if the documents already exist, the clients has compiled them themselves or have been involved in the compilation... Very confusing unit!

Consideration and Proposed Resolution: Noted

Thank you for your feedback

Changed the title and emphasis from client to stakeholders. New title is 'Communicate permaculture system principles to stakeholders.'

This provides opportunity for the unit to address visitors to a permaculture site, or possible investors to a permaculture venture.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

I really don't think this unit is as useful as AHCPER301!

301 was a good unit to deliver and allowed a good range of contexts for assessment - this one is narrower and will be a lot harder to deliver.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

The range of permaculture systems and contexts still have to be learned and assessed in order for a person to be able to communicate the many options they can be exposed to.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

This is another area in which 301's scope has been narrowed.

301 required 'culturally appropriate' communication and communication 'with small groups' and 'colleagues' providing candidates with the opportunity to demonstrate how they would modify their information for different situations and audiences, as well as encouraging more knowledge sharing within the class group

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Culturally appropriate communication is listed in the KE dot point 6.

- communication techniques, including culturally appropriate speech and behaviours to stakeholders.

Reference to 'encouraging more knowledge sharing within the class group' is a delivery strategy and is still quite relevant for this unit.

Organisation Type: State Government

Coverage: WA

Stakeholder Comments:

Re: Performance Evidence - Does this need to include frequency?

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Volume of learning in PER3X1 is at least once.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref AC dot point 2 point 4 incomplete sentence ???

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Amended AC 2.4 incomplete statement corrected. Now reads '• use of treatments and biological agents'

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref to title change and emphasis from Use weedy plants in a permaculture system to Use characteristics of plant resilience in a permaculture system

Although I appreciate the thinking here, I think this confuses the unit - after all, any plant in a permaculture system should be 'resilient'! Which means that observing/assessing etc all resilient plants in a system is a huge job!

Consideration and Proposed Resolution: Noted

Thank you for your feedback

Units descriptor confirms that characteristics of plant resilience in a permaculture system includes controlling resilient plant species and plants deemed weeds through succession and harvesting in a permaculture system.

It is specified in PE that resilience plants are recorded/assessed for one permaculture site.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref Application statement Ambiguous at end of para - deemed weeds through the process of succession or the process of succession is a means of using characteristics... I know its the latter but may not be clear to a casual reader

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Edited Application Section to read:

'This unit of competency describes the skills and knowledge required to use the characteristics of plant resilience in a permaculture system, including controlling resilient plant species and plants deemed weeds through succession and harvesting in a permaculture system.'

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 1

'weedy' not 'weeds' - or leave off final 'plants'

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Removed reference to weeds from KE dot point 1

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 7 sub points list

Change to 'such as'

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

The list has been edited for more generic application and lists required underpinning knowledge.

Now reads:

' uses for resilient plants and weeds including commercial uses, including:

- bird and animal feed
- arts and crafts
- soil improvers'

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 7 and 8, and use of 'including'
... but the ones in this section can stay...

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the SMEWG agrees with the retention of 2nd level dot points in KE 7 and 8 of this unit and so these have been kept.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Re: Assessment Requirements

Is it expected that the one that is not used in establishment (ie urban or rural) will be covered in Knowledge questions? Sounds like a big task - maybe better to re-frame KE here

Consideration and Proposed Resolution: Noted

Thank you for your feedback

Answer to question is yes. All knowledge of establishment of a permaculture system need to be assessed according to the KE, which covers both urban and rural situations, however performance evidence requires the practical establishment of only one permaculture system; either urban or rural situations.

This unit is an amalgamation of AHCPER307 Establish a rural permaculture system and AHCPER308 Establish an urban permaculture system. SME advice is that learners are not required to do both. PE indicates that the individual has established a permaculture system in either an urban or a rural situation.

The KE of this unit will be confirmed with stakeholders at validation stage.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot points 1 through 6 and their respective sub points

Change 'including' to 'such as' here and in the following 4

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the SMEWG has advised the retention of the word 'including' for these bullet points, however this will be highlighted and confirmed at validation stage.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref PE dot point 4

This has become huge, I can see having all of this in knowledge evidence but to have it in performance makes it relatively unachievable to do year after year. I can see installing and accessing water storage systems once for a site but this is something you would employ a specialist to do, not a cert III perm.

Overall the improvement to the unit to make it less about irrigation and more about perm water systems is great.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

The unit of competency calls for install and maintain and therefore requires the individual to perform these tasks to be deemed competent. There are options within the PE to select a system within the scope and capability of the RTO if there is no actual workplace to provide.

Thank you for the positive feedback regarding the other aspects of the unit.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref KE dot point 2 permaculture water capture systems... sub points

Love to see wicking beds added into this list. They are a capture and storage and irrigation system all in one. Understanding these really helps with understanding many principles associated with water in a perm system.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Added 'wicking beds' to the KE dot point 2.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref PE dot point 4 to 6

This is not realistic for sites that already have these systems installed, suggest investigated and understood the installation and access OR installed and prepared access, same for the distribution system

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Dot point 4 to 6 changed to "installed and prepared access".

A note that there is scope within the PE to select a system within the capability of the RTO if there is no actual workplace to provide.

Organisation Type: State Government

Coverage: WA

Stakeholder Comments:

Re: Performance Criteria 4 and 6 - Bullet point numbering needs reviewing

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Numbering corrected for PCs in PER3X4.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref to PE volume of learning and RB comment asking if 2 is achievable

Yes it's reasonable except for the last, I think a house is overdoing it. It should be a low retaining wall, max height less than anything needing a DA.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Edited to 'retaining wall not requiring permits' as suggested.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref to PE volume of learning 2nd section dot point 4 with sub points (is this suitable?)

Great list and yes achievable

Consideration and Proposed Resolution: Noted

Thank you for your feedback and support.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref PC4.1

Formwork etc if needed

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

PC 4.1 would include formwork if the construction required it. No changes made.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref Unit PC Element 4

This section is a double up of Establish a permaculture system. It makes a very big unit enormous. The time frame needed for these criteria is too much.

For students to prepare a schedule and detail plant needs and suggest location for sourcing is part of planning. No 4 criteria is another area. We plan then implement.

Consideration and Proposed Resolution: Noted

Thank you for your feedback

The previous version of this unit (PER312), was a planning unit which did not fit with AQF3. SME group advice was that the unit was about planting an orchard and garden, however the design/planning should be addressed at level 4 and 5. As such, this unit has been updated with a title change to better reflect the work activity.

The new version of the unit (PER3X6) is not about establishing a permaculture system from a plan or design (this is covered in the unit AHCPER3X3, which combines previous PER307 and PER308). The unit is specifically planting orchards and gardens and calls on additional skills particularly seasonal issues. The PE has been structured to make it achievable by RTOs.

It should be noted that some duplication of elements in different units of competency is common, as similar skills may be required for different job tasks. This may allow for clustered delivery and assessment of the units.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref Comment RB1

I agree with RB1. If it is necessary to implement the plan then can we reduce it to a section not the a whole orchard and garden. maybe one garden bed and 2 fruit tree with support plants.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

The PE allows for the individual to have "prepared a garden and orchard zone and sector plan for garden and orchard" this doesn't require actual planting.

A key practical part for assessment is that the individual has:

- acquired, prepared and planted at least 5 fruit trees/shrubs for orchard system.

Organisation Type: Registered Training Organisation

Coverage: WA

Stakeholder Comments:

Ref PE volume of learning on 2 occasions

This would be a challenge to deliver in the normal time constraints (usually 5 units are delivered in a term, unless they were small projects. It would be better to have one project and focus on quality

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Amended PE to 'coordinate at least one community project'.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Ref PE dot point 3 volume of learning

Suggest at least 4 using at least 4. A lot of permaculture propagation is in ground, layered in situ or transplanting volunteers. This unit is heavily weighted toward conventional nursery propagation which of course is valuable knowledge and skills, but it doesn't take into account the way that permaculture integrates propagation with many other activities.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Amended PE dot point 3 to '..for at least 4 plants using at least 4 of any of the following propagation techniques' as suggested.

Organisation Type: State Government

Coverage: WA

Stakeholder Comments:

Re: Performance Evidence - 'Implemented propagation plan for at least X plants using at least 5 of any of the following propagation techniques.'

Does each plant require at least 5 propagation techniques?

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Amended Performance Evidence to better reflect outcomes and clarify propagation techniques. Wording now reads as:

There must be evidence that the individual has coordinated and implemented propagation activities for at least 4 different plants in permaculture system and has:

- researched plant propagation requirements
- planned and scheduled plant propagation
- implemented propagation plan using at least 4 of any of the following propagation techniques:
 - cuttings
 - layering
 - division
 - grafting
 - budding
 - seed sowing
- maintained propagated plants to maturity or distribution
- updated records and plant propagation plan.

Organisation Type: Peak Industry Body

Coverage: NSW

Stakeholder Comments:

Ref PC 2.5

The original version of this unit stated "Analyse bioregional and neighbourhood context for the site". The term neighbourhood needs to be included again. Students are getting lost in big picture bioregional analysis and missing the impact and importance of the immediate neighbourhood context and character, which in Urban design is particularly important

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Recommendation adopted.

Amended PC2.5 to read "Conduct a neighbourhood and bioregional analysis for site".

Organisation Type: Peak Industry Body

Coverage: NSW

Stakeholder Comments:

Re: KE

Change:

Neighbourhood and bioregional analysis, to;

Neighbourhood context or neighbourhood character

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Added Neighbourhood context to KE. Bullet point now reads as 'neighbourhood context and bioregional analysis'.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref PE volume of learning

Worth specifying a period of time too?

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

This feedback was raised with the SMEWG for additional input.

The SMEWG advised that a time limit not required to be specified in the unit. Further guidance will be provided in the CVIG about how the Performance Evidence can be applied for this unit.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 4 - characteristics and interrelationships...
sub points earthworks and aquaculture

Remove these two as not relevant to all systems (or change 'including' to 'such as')

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the 2nd level bullets have been retained - Reference to earthworks and aquaculture in the KE is for awareness of the impact. While not all systems have these, individuals should be aware of the influence on integrated plant and animal systems.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE sub points in all instances

Change all instances of 'including' in this list to 'such as' or its way too big to deliver.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

This will be highlighted and confirmed at validation stage.

Organisation Type: State Government

Coverage: WA

Stakeholder Comments:

Re: Unit title

Standards for Training Package - unit titles must concisely describe the unit outcome. Can quotation marks be used?

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Quotation marks to be removed from PER4X3.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref PE volume of learning

Think this should be 'at least 2 occasions' - one design is not enough to demonstrate skills and knowledge

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

The following has been added to the PE:

'There must be evidence that the individual has designed an integrated permaculture system for at least 2 sites which must include:

- a rural environment
- an urban or environment.'

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 3 - strategies for building and working...

Don't think this is needed - many designs won't require this, so it isn't necessary knowledge for the unit (and will be hard to assess in many cases)

Consideration and Proposed Resolution: Adopted

Thank you for your Feedback.

Dot point 3 in KE has been deleted as suggested.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 5 - strategies for settlement design...

What's a 'settlement design'?

Consideration and Proposed Resolution: Adopted

Thank you for your Feedback.

Amended KE dot point 5 for clarity, it now reads:

'strategies for community settlement development and working with planning authorities'

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 9 - site surveying methods..... sub point 5 satellite navigation systems.

Maybe not as an essential requirement?

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Changed KE Dot point 9 sub point 5 to 'digital survey technologies' as this may include GPS, GIS, Drones and other tech used in surveying without being too specific.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 14 - 'computer-aided drafting and design'

Makes it so much harder to assess and more equipment required...

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Removed reference to CAD and replaced with 'drafting technologies'. This permits the use of conventional pen and paper based systems but also allows for CAD where a contemporary approach is more relevant.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Referring to another comment regarding solutions for both urban and rural permaculture systems if both urban & rural are needed, 2 designs are needed anyway

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

The following has been added in PE for clarification:

'There must be evidence that the individual has designed an integrated permaculture system for at least 2 sites which must include:

- a rural environment
- an urban or environment.'

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Problem with this unit has always been lumping planning and learning in together with all performance criteria whereas in reality it is generally either a planning activity (eg to come to a group decision) or a learning activity (eg demonstrating a skill) - very hard to combine the two. Unfortunately this update doesn't address this issue.

Options:

Include better definitions of planning and learning so it is clear what's needed. See comment below re needed one example of each OR

Drop the 'planning' part of the unit to have it covered by the new AHCPER6X2 unit

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

This feedback was referred to SME group for resolution, and they have advised:

Drop the 'planning' part of the unit to have it covered by the new AHCPER6X2 unit (Plan community governance and decision-making processes) which has been done.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref PE volume of learning.

Change to 'one planning and one learning activity'?

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Based on SMEWG feedback, the unit has been revised to remove references to planning. The focus is now about facilitating participatory learning activities (as opposed to facilitating participatory planning and learning activities).

Feedback will be sought from stakeholders at the validation stage to confirm recent unit changes.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot point 3 participatory planning and learning activities and processes such as:

team building – ice breakers, trust games, creative and social activities, goal-setting, celebration and cultural activities

creative expression – wild design, mime, performing and visual arts, story telling

problem solving – brainstorming, mind mapping, random-input processes, PMI, SWOT, Six Thinking Hats, theming and chunking, affinity matrix, modelling

experiential – visualisation, affirmation, role play, cultural mapping, 6 senses, modelling, simulations, educational and experiential games

information gathering – group and individual research and observation activities, sharing information, questioning, resource and skills mapping, surveys, field trips

Negotiation – open forum, active listening, prioritisation, consensus building, win-win.

Dynamic Groups, Dynamic LearningÔ facilitation skills and methodology (Robin Clayfield)

Change to 'such as' - don't want to have to assess all of these!

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the 2nd level bullets have been removed as they refer to examples.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref General comment regarding Performance Evidence (PE)

Would be useful to recommend a timeframe that the strategic plan is to operate under eg 1 to 5 years - this has been a bone of contention with some candidates in the past.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

PE amended to include 'which must represent a time period of at least two years'.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

Ref KE dot points 1, 2 and 3

Permaculture principles, ethics and practices, including:

Permaculture values

Permaculture projects

Change 'including' to 'such as' in all 3 cases here otherwise there is just too much to assess!

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

As part of the review of these units of competency, use of 'such as' in the Knowledge Evidence was checked as use of this terminology is not appropriate due to the requirement that all content in units be mandatory. i.e. suggestions/examples are not permitted. In some instances it was appropriate to change 'such as' to 'including', as all second level bullets were required for the unit. However in some cases the second level bullets served only to provide examples of the types of content that could be relevant to the top level bullet.

These updates were checked with the SMEWG following additional stakeholder feedback during Public Consultation. Advice from the SMEWG was:

- Remove 2nd level dot point list if referring to examples.
- Retain 2nd level dot point lists if underpinning knowledge.

Based on this feedback, the use of "such as' is not appropriate.

Section Index

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Organisation Type: Employer

Coverage: WA

Stakeholder Comments:

RE: Assessment Conditions

Support removal of extra assessors requirements (above ASQA standards)

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Extensive discussion took place with the SMEWG about this feedback regarding the need for assessment to be undertaken by permaculture practitioners/trainers only. It is important to note that there has never been a suggestion that trainers and assessors would not be required to meet ASQA requirements for delivery/assessment of any training package components.

With this in mind, the resolution by the SMEWG is for the Assessor Conditions in PER units to include the following statement: 'Assessors of this unit must satisfy the requirements for assessors in applicable vocational education and training legislation, frameworks and/or standards.'

Additional guidance for RTOs for engaging trainers and assessors will be included in an updated version of the Companion Volume Implementation Guide to be released along with the newly endorsed permaculture qualifications and units.'

Organisation Type: Employer

Coverage: WA

Stakeholder Comments:

Do not support removal of assessor requirements in Assessment Conditions in units of Competency as currently listed (those which are in addition to ASQA requirements). E.G. Cert III and or PDC. They should remain

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Extensive discussion took place with the SMEWG about this feedback regarding the need for assessment to be undertaken by permaculture practitioners/trainers only. It is important to note that there has never been a suggestion that trainers and assessors would not be required to meet ASQA requirements for delivery/assessment of any training package components.

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Additional guidance for RTOs for engaging trainers and assessors will be included in an updated version of the Companion Volume Implementation Guide to be released along with the newly endorsed permaculture qualifications and units.'

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Thank you for the work your team is doing on the Permaculture Skills Project.

[Our organisation] is extremely concerned about the suggestion that a non-accredited Permaculture trainer would be allowed to deliver and assess certified Permaculture courses. As a VET trainer myself, the notion that an unqualified Trainer would be allowed to teach and assess a body of knowledge and skills outside their own training and experience is contrary to ASQA requirements which include:

- the vocational competencies at least to the level being delivered and assessed
- current industry skills directly relevant to the training and assessment being provided, and
- current knowledge and skills in vocational training and learning that informs their training and assessment.

The pre-requisite for a Permaculture Tutor to hold a nationally accredited credential eg. Certificate III (or higher) in Permaculture is not a barrier for Permaculture delivery and assessment, instead it is a means of retaining the integrity of the information, the skills and knowledge and the Permaculture philosophy.

BRCC totally supports Jules Hartmann's comments and supports the removal of the suggested amendments to change the Permaculture tutor accreditation requirements.

In addition, BRCC does require your organisation to maintain the requirement for assessors to hold a nationally accredited Certificate III (or higher) in Permaculture.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Extensive discussion took place with the SMEWG about this feedback regarding the need for assessment to be undertaken by permaculture practitioners/trainers only. It is important to note that there has never been a suggestion that trainers and assessors would not be required to meet ASQA requirements for delivery/assessment of any training package components.

With this in mind, the resolution by the SMEWG is for the Assessor Conditions in PER units to include the following statement: 'Assessors of this unit must satisfy the requirements for assessors in applicable vocational education and training legislation, frameworks and/or standards.'

Additional guidance for RTOs for engaging trainers and assessors will be included in an updated version of the Companion Volume Implementation Guide to be released along with the newly endorsed permaculture qualifications and units.'

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

I heartily agree with [stakeholder] comments here and add that in NSW, the State Government has been recognising and funding Permaculture qualifications and units for around a decade. This is because we were a strong part in successfully convincing them that they consider it to be highly needed qualifications that serves a different industry need to horticulture and agriculture. It is complimentary but requires different thinking and practice, especially even more relevant in this high need for environmental and community resilience. Permaculture trainers, to teach and assess well, must have current qualifications and industry experience that relate directly to this thought and practice. They cannot just be transferred from other experience just because it may relate to plants, water, and soil.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Extensive discussion took place with the SMEWG about this feedback regarding the need for assessment to be undertaken by permaculture practitioners/trainers only. It is important to note that there has never been a suggestion that trainers and assessors would not be required to meet ASQA requirements for delivery/assessment of any training package components.

With this in mind, the resolution by the SMEWG is for the Assessor Conditions in PER units to include the following statement: 'Assessors of this unit must satisfy the requirements for assessors in applicable vocational education and training legislation, frameworks and/or standards.'

Additional guidance for RTOs for engaging trainers and assessors will be included in an updated version of the Companion Volume Implementation Guide to be released along with the newly endorsed permaculture qualifications and units.'

Organisation Type: Employer

Coverage: QLD

Stakeholder Comments:

I do want to support the comment by [stakeholder] and to express my understanding that it was a foundational idea to maintain real permaculture in the units and consequently demonstrated in the assessment. We always believed the work by participants could only be truly understood by a Permaculture practitioner/trainer to assess.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Extensive discussion took place with the SMEWG about this feedback regarding the need for assessment to be undertaken by permaculture practitioners/trainers only. It is important to note that there has never been a suggestion that trainers and assessors would not be required to meet ASQA requirements for delivery/assessment of any training package components.

With this in mind, the resolution by the SMEWG is for the Assessor Conditions in PER units to include the following statement: 'Assessors of this unit must satisfy the requirements for assessors in applicable vocational education and training legislation, frameworks and/or standards.'

Additional guidance for RTOs for engaging trainers and assessors will be included in an updated version of the Companion Volume Implementation Guide to be released along with the newly endorsed permaculture qualifications and units.'

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

I strongly disagree with the removal of any requirement to have a minimum of a Cert III or PDC to assess Perm Units (I can't access the exact wording).

I really don't think unless an assessor has done some sort of serious immersion in Permaculture they can understand what we are all about. Sure the content of a number of units relates to Horticulture, Agriculture etc but in Permaculture we look at the content different and have different interpretations.

I think that taking away this assessor requirement will dilute and reduce the essence of Permaculture.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Extensive discussion took place with the SMEWG about this feedback regarding the need for assessment to be undertaken by permaculture practitioners/trainers only. It is important to note that there has never been a suggestion that trainers and assessors would not be required to meet ASQA requirements for delivery/assessment of any training package components.

With this in mind, the resolution by the SMEWG is for the Assessor Conditions in PER units to include the following statement:

'Assessors of this unit must satisfy the requirements for assessors in applicable vocational education and training legislation, frameworks and/or standards.

Additional guidance for RTOs for engaging trainers and assessors will be included in an updated version of the Companion Volume Implementation Guide to be released along with the newly endorsed permaculture qualifications and units.'

Organisation Type: Registered Training Organisation

Coverage: WA

Stakeholder Comments:

Regarding the unit AHCPER212 Use and maintain garden hand tools and equipment- The Assessment Conditions state 'Assessors must also hold a nationally accredited Certificate III (or higher) in Permaculture to assess this unit of competency and/or have completed a Permaculture Design Course (PDC) and/or have completed the Permaculture Demonstrator Skill Set.' This seems a bit extreme for a garden tools and equipment unit. It's not a requirements for the machinery and equipment unit which requires the use of motorised machinery and power tools. I would really appreciate some clarification around this and also my initial query regarding the unit AHCWRK209.

Consideration and Proposed Resolution: Other

Thank you for your feedback.

Extensive discussion took place with the SMEWG about this feedback regarding the need for assessment to be undertaken by permaculture practitioners/trainers only. It is important to note that there has never been a suggestion that trainers and assessors would not be required to meet ASQA requirements for delivery/assessment of any training package components.

With this in mind, the resolution by the SMEWG is for the Assessor Conditions in PER units to include the following statement:

'Assessors of this unit must satisfy the requirements for assessors in applicable vocational education and training legislation, frameworks and/or standards.

Additional guidance for RTOs for engaging trainers and assessors will be included in an updated version of the Companion Volume Implementation Guide to be released along with the newly endorsed permaculture qualifications and units.'

Organisation Type: Employer

Coverage: QLD

Stakeholder Comments:

Emerging skills

Creativity, originality and initiative

Analytical thinking and innovationActive learning

Technology design and programming

Complex problem-solving

Critical thinking and analysisLeadership and social influence

Emotional intelligence

Reasoning

Resilience, stress tolerance and flexibility

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Emerging skills integrated across Permaculture units of competency from levels 1 to 6.

Organisation Type: Peak Industry Body

Coverage: National

Stakeholder Comments:

Supportive of list of the PER units that are recommend being included in Ag qualifications

Consideration and Proposed Resolution: Noted

Thank you for your feedback and support.

Organisation Type: Peak Industry Body

Coverage: TAS

Stakeholder Comments:

I'm a permaculture practitioner with a PDC. I had a quick look at the proposed changes to the permaculture units at TAFE on the Skills Impact website.

My main concern is that it appears that permaculture is being treated as a way of gardening. All the units are related to gardening, agriculture, backyard or farm design, or communicating this with clients or community organisations. This gives a false impression to students that permaculture is limited to systems for gardening or earth care.

Permaculture actually includes alternative economies, homeschooling, home birth & death, social structures, household waste reduction, carbon drawdown, energy use, house design, low impact travel, slow fashion, people care and ethical distribution of resources (fair share). It's misleading to only include plant and animal systems.

At the minimum, there should be units on social permaculture (people care), fair share, sustainable house design/retrofitting and financial permaculture

Consideration and Proposed Resolution: Adopted

Thank you for your feedback

Broader aspects of permaculture (outside gardening and earthcare) are covered in KE where possible, including:

- energy use
- alternate technology
- house design
- social permaculture
- ethics
- waste reduction and recycling.

Organisation Type: Training Board

Coverage: NT

Stakeholder Comments:

A potential gap in training delivery may be that industry does not understand what a person with a permaculture qualification brings. Only those with direct understanding of how broad those permaculture skills and knowledge are realising the benefit.

There is demand from learners for permaculture skills and from an employment perspective in certain local and regional areas

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Comment noted.

One of the intentions of this project is to encourage broader understanding of skill requirements for learners undertaking permaculture based qualifications.

Organisation Type: Employer

Coverage: National

Stakeholder Comments:

Permaculture is a design principal that works on different scales. The following areas can be professionally work opportunities for Permaculturists with these certificates

- backyard permaculture
- permaculture in nursery and commercial plant operation settings
- permaculture in agricultural and agriforestry settings

Consideration and Proposed Resolution: Noted

Thank you for your feedback

This comment was made in response to another stakeholder comment questioning existing job roles in permaculture and whether there was a need for separate permaculture qualifications at levels I to Diploma.

Industry feedback has confirmed that Certificates II,III,IV and V in permaculture will be retained and job roles clarified at each level.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

I'm concerned that the respondent was possibly not part of the consultation process from the beginning when we addressed these concerns.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

This comment was made in response to stakeholder comment questioning existing job roles in permaculture and whether there was a need for separate permaculture qualifications at levels I to Diploma.

Industry feedback has confirmed that Certificates II,III,IV and Diploma in Permaculture will be retained and job roles clarified at each level.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

We are in a rapidly changing world and the skills and knowledge of permaculture graduates are likely to become further in demand. As just a couple of examples: collapsing global supply chains will force at least some measure of re-localisation - I doubt there is any other area in AHC that even mentions it, but it is a core concept in permaculture; likewise the cost of synthetic fertilizers and thus we need training in methods that use alternative methods for food growing; the uptick in interest in food growing during lockdowns has led to a need for more small-scale food-focused garden designers and advisors... I could go on! Permaculture = skills for a future and needs to be recognised as such.

Consideration and Proposed Resolution: Noted

Thank you for your feedback

This comment was made in response to stakeholder comment questioning existing job roles in permaculture and whether there was a need for separate permaculture qualifications at levels I to Diploma.

Industry feedback has confirmed that Certificates II,III,IV and V in permaculture will be retained and job roles clarified at each level

Organisation Type: Registered Training Organisation

Coverage: WA

Stakeholder Comments:

Occupational outcomes involves teaching, consultation, nursery work (production and retail), landscaping (there is evidence in my region of clients requiring gardeners to have knowledge of permaculture to maintain their properties, production horticulture utilising permaculture methods. There is a lot of potential for graduates of accredited permaculture to start their own businesses.

That aside, there is demand from the public for permaculture education. I think a flaw in the Tafe/Training system is only providing education that industry demands, when often this doesn't align with what people paying for training want to learn. People want to pay for permaculture education, and classes can easily be filled.

Consideration and Proposed Resolution: Noted

Thank you for your feedback

This comment was made in response to stakeholder comment questioning existing job roles in permaculture and whether there was a need for separate permaculture qualifications at levels I to Diploma.

Industry feedback has confirmed that Certificates II,III,IV and V in permaculture will be retained and job roles clarified at each level.

Organisation Type: Training Board

Coverage: WA

Stakeholder Comments:

While I like permaculture as a concept, it does not have four job/occupational outcomes (one for each qualification), or even one. It is like saying someone wants a certificate for Hyundai automotive technology because Hyundai is different to other cars.

Permaculture is a social/community activity. At best there should be skill sets or even perhaps a stream (as is proposed with organic farming). In many cases, Units simply duplicate other AHC Units but with the word 'permaculture' and some permaculture knowledge evidence added in. For example compare: A and AHCPHT214HCPER208 I don't know why the harvesting of permaculture crops would be different to harvesting other crops (at the Unit level).

Part of the rationale given for the Certificate II is that it is undertaken by school students. That's great, but that is not a valid reason for establishing/accrediting it. The Certificate needs to have real (and separate) job outcomes. Vocational qualifications are meant to be based on jobs (which can include unpaid jobs). I can find no evidence of permaculture jobs (in WA).

Consideration and Proposed Resolution: Noted

Thank you for your feedback

Permaculture SMEWG advise that Permaculture is a different industry to those of traditional Horticulture and Farming. When developing the Workforce functional analysis this difference was clearly evident and as such qualifications and units were reviewed with this difference in mind.

Organisation Type: Employer

Coverage: WA

Stakeholder Comments:

Possibly too many skill sets - some may not be relevant

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Feedback from stakeholders were supportive of the skill sets.

Organisation Type: Employer

Coverage: WA

Stakeholder Comments:

There is a need for a skill set which focuses on small business management - around level III to IV and includes PER units with a small business management unit

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Referred to SME group for resolution.

Resolution:

Results of TGA search has found multiple skill set suitable for PER business development. As a result, the SMEWG does not recommend development of another skill set for small business purposes as many exist addressing these skills needs. See examples below:

AHCSS00030 Farm Business Management Skill Set

- AHCBUS512 Develop and implement family business structures and relationships
- AHCBUS516 Develop and review a business plan
- AHCBUS517 Monitor and review business performance
- BSBRSK501 Manage risk

BSBSS00102 Micro business skill set

- BSBESB301 Investigate business opportunities
- BSBESB401 Research and develop business plans
- BSBSS00103 New Business Ventures Skill Set
- BSBESB301 Investigate business opportunities
- BSBESB302 Develop and present business proposals
- BSBESB303 Organise finances for new business ventures
- BSBESB304 Determine resource requirements for new business ventures

BSBSS00104 Small Business Management Skill Set

- BSBESB401 Research and develop business plans
- BSBESB403 Plan finances for new business ventures
- BSBESB405 Manage compliance for small businesses
- BSBESB407 Manage finances for new business ventures

Organisation Type: Employer

Coverage: SA

Stakeholder Comments:

Supportive of newly created skill sets

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Organisation Type: Peak Industry Body

Coverage: National

Stakeholder Comments:

Supportive of newly created skill sets. Stakeholder believes they will encourage experienced trainers to become RTOs. Keep all skill sets as very advantageous.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback and support of the new skill sets.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

Social Permaculture is so much more than coordinate a community project, I still think we need to develop a unit that encompasses all of social permaculture. OR review 301 again to ensure that social perm is included in knowlege criteria .

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

SME advise that social permaculture should be embedded in existing units, including AHCPER301, which has been done.

Organisation Type: Employer

Coverage: WA

Stakeholder Comments:

Ensure that drone useage is included in landscape design and other units where applicable

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Reference to Digital Technologies (including drones) has been included in units of competency where applicable and recommended by SMEWG.

Organisation Type: Registered Training Organisation

Coverage: NSW

Stakeholder Comments:

I've commented on some areas of the drafts, particularly certificate 3 and had a look at cert IV.

Overall it looks great.

I am very concerned however about 2 units in cert III, AHCPER3X4 and AHCPER3X6. These have been dramatically changed and I don't think are achievable in their draft forms. Comments are in the drafts.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Please refer to the unit section of this document for specific responses to comments for AHCPER3X4 and AHCPER3X6.