

# Responding and Assisting in Bushfire

## Summary of Feedback, Responses and Actions - Validation



28 March 2022

Draft new units of competency for skills in post-bushfire cleaning operations and chainsaw operations were made available on the [Skills Impact website](#) for stakeholder review and validation from 1 to 25 April 2022. Please visit the website to view a full list of the drafts that were submitted for consultation during the validation phase.

Feedback was received via email, the Skills Impact Feedback Hub, webinars and phone as follows:

	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>								

\* 74 stakeholders (38 for bushfire recovery and 36 for chainsaw operations) were contacted directly via email to engage in project consultations. These individuals included representatives from forest and arboriculture employers and associations, fire and emergency services agencies, registered training organisations, relevant Skill Services Organisation - including Public Services IRC members, and skills advisory bodies. The Australasian Fire and Emergency Service Authorities Council (AFAC) and the majority of forest industry associations and skills advisory bodies confirmed that the project's information and links to draft components were distributed to their members to encourage participation. Project reports and invitations to offer input were also provided to the Australian Forest Products Association's Safety Committee and the Tasmanian Forest Industry Fire Management Committee (FIFMC). Along with the news updates issued by Skills Impact, editorial and advertisement messages about the project and its consultations were published in external industry publications such as Daily Timber News and Leaflet. Representatives from the Construction Forestry Maritime Mining and Energy Union (CFMMEU) were kept informed of the project and encouraged to communicate it to members. No specific feedback has been provided on the components by agencies, industry associations or the CFMMEU at this stage.

Feedback received during the 'Validation' period for the units of competency has been positive, with minor changes or updates suggested by stakeholders.

Below is a summary of the feedback raised for the draft qualifications, skill sets and units of competency developed and reviewed for the Responding and Assisting in Bushfire project, 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 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, AHC – Agriculture, Horticulture, Conservation and Land Management, FWP – Forest and Wood Products**

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# Summary of Feedback on Draft Units of Competency

## Skills for Vegetation Clearing and Clean-up Operations in Bushfire Zone – New Units of Competency

### General Comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Employer (SA)	Units endorsed.	Noted. Thank you for your endorsement.
Employer (VIC, NSW, QLD)	Internal, organisational procedures exist for these activities on plantations, and we would engage contractors for specifics	Noted. Thank you for your feedback.
Employer (NSW)	Units endorsed	Noted. Thank you for your endorsement.
Employer (TAS)	Units endorsed - have nothing else to add. Well thought out and structured units.	Noted. Thank you for your endorsement.
Employer (WA)	As an overall comment <i>FWPFIR4XXX Conduct tree hazard assessment post-fire</i> and <i>FWPFIR3XXX Apply communication protocols during post-bushfire vegetation clearing and clean-up operations</i> , our organisation already has a course called Tree Hazard Assessor which was developed based on an operational need and trains our staff to our SOPs. This course is run by district and regional personnel and is not an accredited course but rather developed to address a gap in knowledge transfer. With that, it would be unlikely that we would be looking to adopt a UOC for this course unless there was an industry push to do so as it would completely change our delivery model and mean that our districts would not be able to deliver to meet their operational needs but rather would have to rely on our central Fire Training team to deliver something accredited.	Noted. Thank you for your feedback.
Employer (WA)	Units endorsed - confirmed that the changes that have been input are appropriate and is a true update that fits in with requirements and expectations for dealing with fire effected trees after a bushfire.	Noted. Thank you for your endorsement.
Employer (QLD)	Units endorsed - have not comments or concerns to raise.	Noted. Thank you for your endorsement.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Employer (VIC)	Units endorsed – I have read through docs and concluded that they look good.	Noted. Thank you for your endorsement.
Employer (SA)	Units endorsed – no further comments.	Noted. Thank you for your endorsement.

### FWPFIR3XXX Apply communication protocols in vegetation clearing and clean-up operations in bushfire zone

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Employer (SA)	Unit endorsed	Noted. Thank you for your endorsement.

### FWPFIR4XXX Conduct tree hazard assessment post-fire

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Employer (SA)	<p>In the prerequisites we believe there needs to be indication of the underlying competencies required to show that knowledge or understanding of species of trees, flora and fauna exists.</p> <p>It seems that an understanding the effects of fire on trees is required because they will be assessing safety.</p> <p>It is important that a prerequisite is in place for this unit as there needs to be sound knowledge of how certain species are affected by fire along with and emphasis one the fact that the risk assessments are being undertaken for others carrying out tasks.</p>	<p>Thank you for your feedback.</p> <p>Item added to Knowledge Evidence – tree species and effects of fire on different trees species.</p> <p>Performance Criteria 2.3 amended to read - Establish risk to self and others posed by hazard tree and other factors in immediate vicinity of the tree.</p>
	<p>Regarding Performance Criteria:</p> <ul style="list-style-type: none"> <li>Add the underlined words in the following PCs as shown: <ul style="list-style-type: none"> <li>1.1 Maintain up to date information on topography, <u>hazards</u> and weather conditions in bushfire recovery area, <u>understand agency approved symbols</u></li> <li>3.1 Assess visually extent of fire damage to crown, trunk and root <u>from the appropriate safe distance</u></li> </ul> </li> </ul>	<p>Performance Criteria 1.1 amended to read - Maintain up to date information on topography, hazards and weather conditions in bushfire recovery area.</p> <p>Performance Criteria 3.1 amended to read - Assess visually extent of fire damage to crown, trunk and root from the appropriate safe distance.</p>
	<p>Performance Evidence – i.e., determine risks posed by tree according to workplace procedures (<u>which ones? - industry or government workplace standards</u>)</p>	<p>Performance Evidence amended to read - identified risks to self and others posed by the tree according to workplace procedures.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	Regarding Knowledge Evidence -i.e., characteristics of culturally significant trees, including Aboriginal scarred trees <u>(along with this part we should state what the process is if one is found)</u>	Knowledge Evidence amended to read - characteristics of culturally significant trees, including Aboriginal scarred trees, and workplace procedures for managing significant trees
	These units of competency are presumably aimed at contractors or plantation owners in recovery or cleaning up. It is important that, if these units of competency pass the appropriate authority, organisations such as ours have input to the training package.	Training and assessment materials are developed by training providers, who are responsible for consulting with employers and other relevant stakeholders throughout the process.
RTO (VIC)	Regarding Performance Evidence - If the species of tree does make a difference to the tree assessment outcomes should the species of the tree be included in the KE as a sub-point under say, the factors affecting tree damage and mortality...'? Also, thinking about the practicalities of assessment, would there be at least five species of recently fire affected trees available for the assessment in a plantation situation or forest community with only a few dominant tree species? Might this requirement present an assessment barrier?	Thank you for your feedback.  Knowledge Evidence amended to include - tree species and effects of fire on different trees species.  Performance evidence redrafted to read - There must be evidence that the individual has conducted a hazard assessment of five fire damaged or fire affected trees, which include two different species.
Employer (VIC)	Regarding Performance Criteria 2.4. <i>Mark tree, if safe to do so, using spray paint and agency approved symbols.</i> Of particular note is <u>Agency Approved</u> symbols. Is this an opportunity to dictate that we use the national symbology marking and follow AFAC National standard as stated in dot point 2 in the below email. We have great difficulty when symbology is different and through some great work involving all AFAC member agencies we have developed a national standard. Given that this is a National Unit should / can we not make it a given?	Thank you for your feedback.  Performance Criteria 2.4 has been redrafted to read - Mark tree, if safe to do so, using spray paint according to industry guidelines and agency approved symbols.

#### AHCARB6XXX Conduct complex tree hazard and health assessment post-fire

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Employer (SA)	We believe there needs to be indication of the underlying competencies required to show that knowledge or understanding of species of trees, flora and fauna exists.	Thank you for your feedback.  Amended Performance criteria 2.2 to read - Locate and determine tree species and tree position in relation to site topography and other hazards at site.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
<p>It seems that an understanding the effects of fire on trees is required because they will be assessing safety.</p> <p>Regarding Knowledge Evidence – i.e.,</p> <ul style="list-style-type: none"> <li>• techniques for identifying culturally significant trees, including Aboriginal scarred trees</li> <li>• tree valuation methods including techniques for identifying ecological and economic value of fire damaged or fire affected trees</li> </ul> <p>Under the above two sections there should be knowledge or at least an understanding of who to contact if a culturally significant tree is identified.</p> <p>These units of competency are presumably aimed at contractors or plantation owners in recovery or cleaning up. It is important that, if these units of competency pass the appropriate authority, organisations such as ours have input to the training package.</p>	<p>Added following to Knowledge Evidence - tree species and effects of fire on different trees species.</p> <p>Knowledge evidence amended to read - techniques for identifying culturally significant trees, including Aboriginal scarred trees and procedures for managing culturally significant trees, including who to contact if a culturally significant tree is identified.</p> <p>Knowledge evidence amended to read - tree valuation methods including techniques for identifying ecological and economic value of fire damaged or fire affected trees and procedures for managing such trees, including who to contact if ecologically and economically valuable trees are identified.</p> <p>Training and assessment materials are developed by training providers, who are responsible for consulting with employers and other relevant stakeholders throughout the process.</p>
<p>RTO (VIC)</p> <p>Regarding Performance Evidence - If the species of tree does make a difference to the tree assessment outcomes should the species of the tree be included in the KE as a sub-point under say, the factors affecting tree damage and mortality...'? Also, thinking about the practicalities of assessment, would there be at least five species of recently fire affected trees available for the assessment in a plantation situation or forest community with only a few dominant tree species? Might this requirement present an assessment barrier?</p>	<p>Thank you for your feedback.</p> <p>Added following to Knowledge Evidence - tree species and effects of fire on different trees species.</p> <p>Performance evidence amended to read - which must include two different species.</p>
<p>Government Department (WA)</p> <p>This is a new AHC unit. Will this unit be released in the AHC Training Package? Where will the unit be housed?</p>	<p>Thank you for your question.</p> <p>Yes, this will be in the next major release of the AHC Training Package Version 9.0, and housed as an elective within the Diploma of Arboriculture.</p>

## Chainsaw Operations – Existing Units of Competency

### General comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Employer (VIC, NSW, QLD)	Units endorsed – Felling units agree and look good	Noted. Thank you for your endorsement.
RTO (NSW)	From my perspective they all look fine, other than the very lukewarm prerequisite requirement for advanced tree felling.	Noted. Thank you for your endorsement.  A response to the prerequisites comment is included below in the section about the advanced tree felling unit.
RTO (VIC)	Units endorsed - agree with the changes made – much better than previous. Most importantly congratulations on actually taking notice of people at the coal face – something which is essential.	Noted. Thank you for your endorsement and support.
RTO (NSW)	Units endorsed - Changes that have been made look much more in line with typical training on the levels relevant.	Noted. Thank you for your endorsement and support.

### FWPCOT2XXX Trim and cut felled trees

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Employer (NT)	Participant suggested 'lightning damage' may be a tree defect to consider when carrying out tree cutting activities. Lightning-damaged trees are not that uncommon in Darwin, although possibly the hazards caused by lightning damage could already be covered by the categories 'splits' and 'fire damage', so you might consider an additional category unnecessary.	Thank you for your feedback.  A lightning strike may result in one or more of the forms of damage noted in the Knowledge Evidence.
RTO (NSW)	My only concern is (and it is being pedantic I know) the wording of the trim and cut unit application in that it stipulates that fallen or felled trees occur in a bushland, plantation or forested setting. This could preclude Local government, emergency services and other government agencies as they are likely to be operating in an urban environment.	Thank you for your feedback.  Application statement reworded to read - For the purpose of this unit of competency, a felled tree is any tree, or part thereof, including, but not limited to a tree trunk, branch or limb that has fallen or has been felled and is laying on the ground in a bushland, plantation, forested or other settings including parkland, roadways and urban areas.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Employer & RTO (NSW)	<p>The definition of a felled tree in the Application section (pg1) removes the ambiguity around what that term means which is very helpful. As in the previous draft the Performance Evidence mandates trimming branches and cutting sections on a 'felled tree' but we now have clarity as to how to interpret that.</p> <p>However, the definition does also specify "in a bushland, plantation or forested setting". Due to the nature of our business requirements (responding to emergency environments), we request that this be broadened in some way so it doesn't preclude other settings needed for training or emergency response.</p>	<p>Noted. Thank you for your endorsement and support.</p> <p>Application statement reworded to read - For the purpose of this unit of competency, a felled tree is any tree, or part thereof, including, but not limited to a tree trunk, branch or limb that has fallen or has been felled and is laying on the ground in a bushland, plantation, forested or other settings including parkland, roadways and urban areas.</p>
RTO (NSW)	Unit endorsed - I certainly agree with the wording now on the units; they now make some sense and more achievable. Thanks for the chance to voice my opinion and job well done.	Noted. Thank you for your endorsement.
RTO (NSW)	Unit endorsed - I agree to the changes	Noted. Thank you for your endorsement.
RTO (WA)	It would be good to explain or define the different cuts (I'm not sure what 'steps' is) but would think other cuts are national and not local.	<p>Thank you for your feedback.</p> <p>Performance Evidence and Knowledge Evidence have been amended to include more context – i.e., 'stagger or step cuts'. All cuts listed in this unit are outlined in the Chainsaw Operator's Manual.</p>
	<p>We need to outline what this unit allows. In WA it allows the felling of standing material up to 4 metres in height and 100 mm diameter at ground level .... Any thing higher or larger is a tree and requires tree falling qualifications. This unit is used to cut scrub and small saplings etc and needs a better definition.</p>	<p>Thank you for your feedback.</p> <p>Keeping in mind that the tree felling units are intended for felling standing trees, without addressing trimming and cutting of felled tree, this unit - as the title, application, and content suggests - describes the skills and knowledge required to trim and cut felled trees of any dimension in order to satisfy a broad application.</p> <p>The proposed definition of "felled trees" reads as follows – For the purpose of this unit of competency, a felled tree is any tree, or part thereof, including, but not limited to a tree trunk, branch or limb that has fallen or has been felled and is laying on the ground in a bushland, plantation or forested setting.</p>
RTO (VIC)	<p>Regarding Performance Evidence:</p> <ul style="list-style-type: none"> <li>• Can we define what a swinging cut is? Do we need it?</li> </ul>	Thank you for your feedback.



Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<ul style="list-style-type: none"> <li>Do we need wedge cuts?</li> </ul>	<p>All the cuts listed in this unit are described in the Chainsaw Operator's Manual.</p> <p>The types of cuts from the Performance Evidence were discussed and agreed upon during the unit's full review in 2020. These consultations have been only for a partial review of the unit to address the implementation issue regarding the "six trees", as reported by a number of training providers. As a result, it is proposed that the debate over the necessity of swinging and wedge cuts be continued during the next full unit review, noting that some participants agreed with them even during this partial review as part of the 'Drafts Available' stage. This feedback has been captured in our issues register for future consideration.</p>

### FWPCOT2XXX Fell trees manually (basic)

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO (NSW)	<p>Regarding Performance Evidence:</p> <ul style="list-style-type: none"> <li>I believe should also be 1/4 -1/3 scarf depth</li> </ul>	<p>Thank you for your feedback.</p> <p>Depth of scarf has been amended to read 1/4 to 1/3 of the diameter of the tree as per the intermediate unit and Tree Feller's Manual.</p>
RTO (VIC)	<p>Regarding Performance Evidence:</p> <ul style="list-style-type: none"> <li>Can this say "1/4 to 1/3" or "to a minimum of 1/4 of the tree diameter"</li> </ul>	<p>Thank you for your feedback.</p> <p>Depth of scarf amended to read 1/4 to 1/3 of the diameter of the tree as per the intermediate unit and the Tree Feller's Manual.</p>
	<ul style="list-style-type: none"> <li>Can the minimum height be higher Eg: 4/10 of the tree diameter - and need to add the word "minimum" or "4/10 or higher"</li> </ul>	<p>It is proposed that the current back cut height parameter (1/10) be retained because it meets the recommendation from the Tree Feller's Manual and was agreed upon during the unit's full review in 2020.</p>
	<ul style="list-style-type: none"> <li>Preference is 4 trees or more.</li> </ul>	<p>Participants suggested that the focus of the Performance Evidence be changed from solely requiring a specific number of trees to be felled towards a demonstration of both cutting and felling techniques. This is due to reports that access to several trees per student for skill assessment is no longer practical due to environmental concerns, particularly in non-forestry settings.</p> <p>According to the proposed changes, the learner must demonstrate competence in performing:</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
	<ul style="list-style-type: none"> <li>standard cutting techniques for felling a tree with basic characteristics on 4 occasions (4 times), which could be achieved, for example, on real trees or sample stamps where real trees are not available, and</li> <li>the felling of 2 rather than 4 trees with basic characteristics by using the same cutting techniques.</li> </ul> <p>Overall, the above can result in a similar, if not better, learning outcome while addressing the issue of tree access in non-forestry settings.</p>
RTO (WA)	<p>Regarding Performance Evidence:</p> <ul style="list-style-type: none"> <li>I would be happy to have the Intermediate and Basic Tree felling Performance criteria the same .... use the intermediate. If not then use 1/10 diameter all the time or 10% all the time. Basic felling has both when it refers to back cut height and hinge wood. I prefer 10% rather than fractions (1/10) but think the depth of the scarf using fractions is better (1/4 to 1/3).</li> <li>Two trees under assessment is not enough. I remain for six, maybe four as a minimum but reluctantly.</li> </ul> <p>Thank you for your feedback.</p> <p>Depth of scarf has been amended to read 1/4 to 1/3 of the diameter of the tree as per the intermediate unit and Tree Feller's Manual.</p> <p>Hinge wood parameter (10%) has been amended to read 1/10 (or 10%) for clarity and consistency within and across the tree felling units.</p> <p>Thank you for your feedback.</p> <p>Participants suggested that the focus of the Performance Evidence be changed from solely requiring a specific number of trees to be felled towards a demonstration of both cutting and felling techniques. This is due to reports that access to several trees per student for skill assessment is no longer practical due to environmental concerns, particularly in non-forestry settings.</p> <p>According to the proposed changes, the learner must demonstrate competence in performing:</p> <ul style="list-style-type: none"> <li>standard cutting techniques for felling a tree with basic characteristics on 4 occasions (4 times), which could be achieved, for example, on real trees or sample stamps where real trees are not available, and</li> <li>the felling of 2 rather than 4 trees with basic characteristics by using the same cutting techniques.</li> </ul> <p>Overall, the above can result in a similar, if not better, learning outcome while addressing the issue of tree access in non-forestry settings.</p>
Government Department (VIC)	<p>Regarding Performance Evidence, proposing a range for the scarf cut angle for the following reasons:</p> <p>Thank you for your feedback.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
<ol style="list-style-type: none"> <li>1. One could debate that 45° as great precise cut, creating the need for the “beginner faller” to only need one angle to learn and adopt. Keeps it pretty simply, a good thing.</li> <li>2. Conversely, this is a pretty precise measurement of evidence. I would challenge anyone (basic to advanced faller) to get 45° precisely on every scarf top cut, let alone asking a beginner to nail this consistently.</li> <li>3. I would like to see a variable. I would propose 30° to 45° as we state in further faller units.</li> <li>4. The application parameters of a “basic tree” would indicate that the variation of a scarf between 30° or 45° is not hugely relevant.</li> <li>5. Successionally, we allow 30° to 45° scarf top cut from intermediate onwards. This variation allows for a number of increased variables in int and adv faller units, so could an argument be; why not train / assess to it from the outset?</li> <li>6. If the basic faller is only cutting 45°, could an argument be that this locks them into the muscle memory of always cutting precisely at 45? As per previous point, a disadvantage on building skill into the future.</li> </ol>	<p>Scarf angle amended to read 30° to 45° to reflect the reasons provided and specifications stated in the Tree Feller’s Manual.</p>
<p>RTO (NSW)</p> <p>I believe that to properly train a participant to basic/intermediate tree falling level of competency a minimum of 4 trees per discipline is essential. 2 trees per discipline is nowhere near sufficient to gauge a participants capability. Two trees and then into the world on their own, this does not calculate well with me in regard to the participants ongoing safety and those around them.</p>	<p>Thank you for your feedback.</p> <p>Participants suggested that the focus of the Performance Evidence be changed from solely requiring a specific number of trees to be felled towards a demonstration of both cutting and felling techniques. This is due to reports that access to several trees per student for skill assessment is no longer practical due to environmental concerns, particularly in non-forestry settings.</p> <p>According to the proposed changes, the learner must demonstrate competence in performing:</p> <ul style="list-style-type: none"> <li>• standard cutting techniques for felling a tree with basic characteristics on 4 occasions (4 times), which could be achieved, for example, on real trees or sample stamps where real trees are not available, and</li> <li>• the felling of 2 rather than 4 trees with basic characteristics by using the same cutting techniques.</li> </ul> <p>Overall, the above can result in a similar, if not better, learning outcome while addressing the issue of tree access in non-forestry settings.</p>

## FWPCOT3XXX Fell trees manually (intermediate)

<b>Stakeholder Comments and Identified Issues</b>		<b>Consideration and Proposed Resolution</b>
Employer (NT)	Participant noted “reducing the Performance requirements to ‘fell two trees’ or ‘demonstrate two techniques’ is a good change, and should make it easier to arrange evaluation of students by an assessor. We often have 2 or 3 students going through assessment at the same time, so arranging to have 2-6 trees to fell will be much easier to achieve than finding 12-18 trees during the short window that the assessor is available.”	Thank you for your feedback and support.
RTO (NSW)	For the practices in this unit, 90deg. and V scarf are really only relevant to Advance Fell, I would never do these at this level. Standard and Humbolt only. My thoughts remember.	Thank you for your feedback.  The unit allows for the selection of 2 of the 4 listed cutting techniques to demonstrate competency, taking into account different applications, tree conditions and situations. According to the Tree Feller’s manual, all 4 cutting techniques are standard tree-felling techniques. As a result, it is proposed that the current performance requirement be retained at this stage.
	I guess we have to be careful when we say forward, back or side lean at this level in particular back lean. Advance trees says heavy forward lean maybe something in the lines of slight lean off centre weight.	Noted. Thank you for comment.  The definition of trees with basic, intermediate and advanced characteristics (that includes forward, back or side lean) were discussed and agreed upon during the unit’s full review in 2020. These consultations have been only for a partial review of the unit to address the implementation issue regarding the "six trees", as reported by a number of training providers.  As a result, it is proposed that the debate over the necessity of clarifying the meaning of forward, back or side lean and heavy forward, back or side lean be continued during the next full review of the unit. This feedback has been captured in our issues register for future consideration.
RTO (VIC)	Regarding Performance Evidence: <ul style="list-style-type: none"> <li>• Does "standard" mean Standard 45?</li> </ul>	Thank you for your feedback.  Performance evidence amended to clarify the meaning of “standard”. It now reads standard (45 degree).
	<ul style="list-style-type: none"> <li>• Can the minimum height be higher Eg: 4/10 of the tree diameter - and need to add the word "minimum" or "4/10 or higher"</li> </ul>	It is proposed that the current back cut height parameter (1/10) be retained because it meets the recommendation from the Tree Feller’s Manual and was agreed upon during the unit’s full review in 2020.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<ul style="list-style-type: none"> <li>Preference is 4 trees or more.</li> </ul>	<p>Participants suggested that the focus of the Performance Evidence be changed from solely requiring a specific number of trees to be felled towards a demonstration of both cutting and felling techniques. This is due to reports that access to several trees per student for skill assessment is no longer practical due to environmental concerns, particularly in non-forestry settings.</p> <p>According to the proposed changes, the learner must demonstrate competence in performing:</p> <ul style="list-style-type: none"> <li>two different cutting techniques, each on 2 occasions (2 times), for felling a tree with intermediate characteristics, which could be achieved on real trees or sample stamps where real trees are not available, and</li> <li>the felling of 2 rather than 6 trees with intermediate characteristics by using the same cutting techniques.</li> </ul> <p>Overall, the above can result in a similar, if not better, learning outcome while addressing the issue of tree access in non-forestry settings.</p>

### FWPCOT3XXX Fell trees manually (advanced)

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Government Department (WA)	Regarding Application - Individuals who seek to undertake this unit should have prior experience in operating a chainsaw for felling trees. How will this be demonstrated?	<p>Thank you for your feedback.</p> <p>This statement has been slightly amended to include additional context for employers, learners and training providers. It now reads “Individuals who seek to undertake this unit should have prior experience in operating a chainsaw for the purpose of felling trees in order to ensure the learner’s safety while completing this unit.”</p> <p>Given that the statement appears in the unit’s Application, it would be regarded as a recommendation rather than a mandatory requirement. It is the responsibility of training provider to determine the level of prior experience that is necessary to ensure the learner’s safety while completing this unit.</p>
RTO (NSW)	I am pleased they have included the need for prior experience before students get to do advanced felling.	Noted. Thank you for your support.
RTO (VIC)	Regarding Performance Evidence:	<p>Thank you for your feedback.</p> <p>Performance Evidence amended in line with the basic and intermediate unit and the participants’ request that the focus be changed from solely</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
<ul style="list-style-type: none"> <li>What is the number of trees – noting 6 has been removed but what is the number now? Participant preference is 4 trees.</li> </ul>	<p>requiring a specific number of trees to be felled towards a demonstration of both cutting and felling techniques. This is due to reports that access to several trees per student for skill assessment is no longer practical due to environmental concerns, particularly in non-forestry settings.</p> <p>According to the proposed changes, the learner must demonstrate competence in performing:</p> <ul style="list-style-type: none"> <li>2 different cutting techniques, each on 2 occasions (2 times), for felling a tree with advanced characteristics, which could be achieved, for example, on real trees or sample stamps where real trees are not available, and</li> <li>the felling of 2 rather than 6 trees with advanced characteristics by using an appropriate cutting technique.</li> </ul> <p>Overall, the above can result in a similar, if not better, learning outcome while addressing the issue of tree access in non-forestry settings.</p>
<ul style="list-style-type: none"> <li>In relation to the words “trees with advanced characteristics” can we add “as described above in the unit application”?</li> </ul>	<p>Because the Unit and Assessment Requirements documents are designed to be used together, this additional explanation “as described above in the unit application” is unnecessary as long as the tree characteristics applicable to this unit are described in the Application.</p>
<p>RTO (NSW)</p> <p>From my perspective they all look fine, other than the very lukewarm prerequisite requirement for advanced tree felling. My view is that advanced tree felling is potentially the most dangerous unit in the FWP training package, and there are insufficient controls built into the competency to manage the obvious risks. My colleague and I have provided more details in previous emails, so I can only assume that you’ve taken our comments into account.</p>	<p>Noted. Thank you for your endorsement.</p> <p>We did take note of the advice regarding the importance of prerequisite units, and we really hope that the addition of the prior experience statement to the Application resulted in some improvement.</p> <p>The chainsaw units were not originally included in the scope of the current project but were added later to address the implementation issue with the "six trees" as reported by a number of training providers. As a result, these consultations have been only for a partial review of the unit.</p> <p>Prerequisites for these units were extensively discussed during their full review in 2020, and due to the lack of consensus amongst stakeholders and our consideration of the primary purpose of prerequisites, as well as the absence of any safety regulatory requirements that would support the pro-prerequisite position, the units’ status quo was maintained.</p> <p>At the time, stakeholders in the arboriculture sector expressed concern that, if prerequisites were introduced, they would create a barrier to training for experienced chainsaw operators who may not necessarily have or be able to access a previous statement of attainment for basic and/or intermediate levels. Other stakeholders cited the safety of beginner</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
		<p>learners, suggesting that the situation could be handled by adding prerequisite units. No safety regulatory requirements could be identified to strengthen and support this position. The majority of training providers indicated that, for safety reasons, their organisation requires students to meet internal prerequisite requirements before enrolling in these units.</p> <p>To conclude,</p> <ul style="list-style-type: none"> <li>• this has been only a partial review and prerequisites have not been its focus.</li> <li>• we recognise that prerequisites are a very complex topic and that restarting the discussion requires a thorough consultation process, ensuring that a diverse range of users are involved. Thus, we propose to add it to the issues register and discuss this with the new industry skills cluster that will be responsible for the FWP training package in the new Skills Organisations' model from 2023 onwards.</li> </ul>
RTO (NSW)	<p>I am of the belief that pre requisites are necessary for Basic and Advanced Tree falling. It only takes three cuts to fell a basic tree but if the participant is unable to then cut the tree up once it is on the ground what is the point in felling the tree. There are a number of cuts that are required to be used in cross cutting, as per the performance evidence, if a participant does not know these cuts they should not be trained to fell trees.</p>	<p>Noted.</p> <p>Thank you for your feedback.</p> <p>Please see the answer above.</p>