

Arboriculture Project



Summary of Feedback, Responses and Actions

April 2019

This project includes the review of 6 qualifications and 42 units of competency and the development of 2 new units, within the *AHC Agriculture, Horticulture and Conservation and Land Management Training Package*. Draft materials were developed as a result of initial input from Subject Matter Experts (SMEs) and were made available for broader stakeholder consultation and feedback between 8 February and 11 March 2018. During this time feedback was received via email, through online surveys, as well as in person at workshops. Written submissions were received from 42 stakeholders around Australia, including 18 from registered training organisations, 7 from Government bodies such as regulators and State Training Authorities, and 17 industry representatives.

As a direct result of feedback received, a number of changes were made to the documents under review. Mostly notably:

- Certificate II in Arboriculture has been redesigned to make it shorter and highly focused on entry level machinery operator skills to enable graduates to gain entry level employment as ground-based tree workers in the arboriculture industry.
- Certificate III in Arboriculture was updated to cater for minor changes and recommendations to the electives and specialisation streams.
- Diploma of Arboriculture had minor changes to the elective units but was otherwise unchanged.
- Entry requirements for both the Advanced Diploma and Graduate Diploma in Arboriculture were reviewed to allow access for a broader base of individuals.

Feedback was received regarding referencing the Minimum Industry Standards (MIS) in selected units of competency. It was generally supported by industry and RTOs. Some RTOs were concerned with the added cost to the organisation and student access to the standards. Based on the feedback and advice from SMEs, the reference to the MIS has been retained as the MIS will assist to increase the skills and knowledge required by the industry.

[Visit the Skills Impact website](#) to view a full list of the documents that were submitted for consultation during this phase.

Below is a summary of the issues raised and how these issues have been dealt with. This involves a consideration of the information provided, views of industry stakeholders where known and views provided by the people who are part of the Subject Matter Expert Working Group process. Resolutions on issues are constructed to take into account 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.

The documents are now available to view and validate on the [Skills Impact website](#) until 12 May 2018

Summary of feedback on qualifications

General feedback

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
General Feedback		
RTO Qld	<p>Minimum Industry Standards</p> <p>It is of our view that these should not be referred to in the units of competency as a mandatory requirement to purchase, use and distribute to students by TAFE's and RTO's. It has also been brought to our attention that these will in time be licensed and an annual licensing fee to be charged which would seem as a commercial gain for a not for profit organisation. These materials seem to be comprehensive but have only been created within the past year and have not been fully trialled to date within industry. Although approved by Arboriculture Association we have some concerns that they are being rolled into the industry without them being accepted by standards Australia and fully tried and tested within industry and training.</p> <p>The MIS guides we feel should have been morphed into the unit of competency rather than produced as individual books and having to pay to get qualified, pay to be a member of the industry body then be expected to pay for standards which are already in the unit of competency.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
	<p>General</p> <p>It's important for the future of quality training and standards within our industry that we do not compromise student/employee safety for personal recognition and commercial gain. We look forward to the second review.</p>	<p>Comments noted.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
General Feedback		
RTO Qld	<p>Prerequisite Units</p> <p>You would be hard pressed to find anyone working in this industry to be working outside a construction environment. Therefore, I believe that the White Card should be a Mandatory Prerequisite unit for all of the qualifications tabled, and a mandatory unit inclusion for the Skillsets. White Card management is becoming more stringent across the industry and especially here in Queensland, however it is a requirement for any job role in construction, if not by the employer, then certainly by their clients. Not including it would, I believe, cause some concern for employers at the engagement-of-worker stage, and potentially disadvantage new entrants to the industry.</p>	<p>Many learners already hold the White Card unit prior to enrolling in an Arboriculture qualification. It has not been included any of the redesigned qualifications as industry advised it is not a priority compared to other arboriculture focussed skills units required by industry.</p>
	<p>Minimum Industry Standards</p> <p>Requiring adherence to MIS is a very valid method to minimise the amount of knowledge and information required in the UoC or Qualification; however, it can become quite onerous on the RTO delivering the courses. I have found MIS303 for sale for \$44AUD. I have not purchased it as yet, but I believe there would be restrictions in the use of the material in a classroom environment, similar to the Australian Standards. With the latter, under the purchasing licence, I could not buy one licence and copy it to a class of 20 students. This then means that the student cost would increase by at least \$44 for the course delivery, and much more where multiple MIS would be needed to deliver a qualification. In addition, I would assume that MIS costs will increase as their popularity and mandatory inclusion grows.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>There is no requirement for every learner to own a copy, but they will need to access the MIS.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
	<p>Embedding Units</p> <p>While this has an effect of reducing the number of units under the qualifications, the nominal hours would most likely (as per the discussion yesterday) remain similar to that of the previous qualifications. Whilst Stakeholder operates in this space without funding from government departments currently, I would like to point out that funding under User Choice and Certificate 3 Guarantee programmes, for example (QLD), is on a per unit basis. Unless Skills</p>	<p>The design of qualifications, units of competency and their assessment requirements is based on industry advice of current job roles and the work functions within those roles. A few arboriculture units are proposed for deletion as they were not considered stand-alone work functions and the relevant outcome of the deleted units has been embedded in units that define work functions required by industry.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
General Feedback		
	<p>Impact is able to lobby these funding bodies for an increase per unit of funding to compensate for the reduction in the number of units, the resulting environment will be the delivery of a similar number of nominal hours (embedded units) with reduced funding (reduction of units per qualification) and increased per student costs (requirement for MIS compliance). In a TAFE environment, this may not be an issue however, in the commercial environment such as the RTO industry, increasing costs and decreasing revenue will become serious consequence. Has there been any discussion around this aspect of the review process?</p>	<p>While we understand the funding concerns, funding is not part of the national project process and issues of funding, nominal hours and training duration are the responsibility of State or Territory funding bodies and RTOs.</p>
<p>Industry Qld</p>	<p>Minimum Industry Standards</p> <p>I have previously commented that I have read through the majority of the standards/course modules in the cert three for the tree work. I feel they cover as well as represent the information, knowledge and techniques needed to become relatively well skilled person to competently and safely do a tree care role in our industry.</p> <p>I've also had a good look over the majority of the minimum industry standards which been written. I feel they're an absolute necessity and great resource material for any registered training Organisation. This minimum industry standard should be included as a reference somewhere in the training packages. It's a very valuable document which is well written and easy to understand and covers relevant information needed to be ascertained and taught to students across the country.</p> <p>As I made it clear at our initial meeting it's normally not the training package that problem it's the people doing the delivery and the more we create a package that allows for very minimal deviation or interpretation the better.</p> <p>Unfortunately there is no shortcut to loaning a trade and tree climbing is no different! I would say it would take a minimum of 3 to 4 years for a completely new beginner to our industry to be up and running at a level that could be left alone to undertake standard tree climbing or tree care procedures. Anything short of this timeframe would probably mean they're under skilled undertrained and not quite ready.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>

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General Feedback		
	<p>The minimum industry standards is a very clear and concise document that covers a wide variety of skills and techniques in a logical and straightforward manner making it very difficult for people to misunderstand or misinterpret. It also will play a valuable role in understanding the core components necessary to pass a unit of competency.</p> <p>I'm happy to discuss any of these things with you further should you have any questions regarding this please don't hesitate to contact me.</p>	
RTO Qld	<p>Prerequisite Units</p> <p>Should not be allowed under the TVET system at all due to prolonged cost and training for industry. If a unit of competence is required it should be in CORE units.</p>	Prerequisite units have been removed from all revised units unless absolutely required.
	<p>Minimum Industry Standards</p> <p>MIS or MIST is widely known throughout the globe: In Australia we do not need any Industry Peak Body or Skills Service Organisations capitalising on this to enlarge it more than it already is! In Australia, Industry develops all standards and become after industry design to the Department of Education and Training (DET) Australian Government who own the courses of:</p> <ul style="list-style-type: none"> • Training Packages • Qualifications • Skill Sets • Units of Competence <p>These are the true Minimum Industry Standards. No need for more other than:</p> <ul style="list-style-type: none"> • Relevant Australian NZ Standards • ISO • WHS • Regulations as required and deemed • Some Local Government requirements 	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>

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General Feedback	
<p>Qualification Design</p> <p>Certificate III: No more than 15 UOCs should apply or you have a double Qualification as in the Cert III in Arboriculture now</p> <p>Diploma: No more than 10 UOCs should apply</p> <p>Advanced Diploma and Graduate Diplomas: No more than 8 UOCs should apply</p> <p>Units of Competence: No pre-requisites should be applied</p>	<p>The design of qualifications including the type and number of unit in each qualification is based on industry advice of current job roles and the work functions within those roles.</p> <p>The Validation draft of the qualifications require the following units to be achieved:</p> <ul style="list-style-type: none"> • 10 for the Certificate II • 18 for the Certificate III • 10 for the Diploma and Advanced Diploma • 5 for the Graduate Diploma <p>While we understand the funding concerns, funding is not part of the national project process and issues of funding, nominal hours and training duration are the responsibility of State or Territory funding bodies and RTOs.</p>
<p>Cost:</p> <p>NSW Cert III Arb is a 48 months apprenticeship Actual funding allowed is around \$9000 depending on employee status</p> <p>QLD is a 36 month apprenticeship Actual funding allowed is around \$4000 depending on employee status</p> <p>As it is now the real cost would be around \$30,000 to deliver training & assessment</p>	<p>While we understand the funding concerns, funding is not part of the national project process and issues of funding, nominal hours and training duration are the responsibility of State or Territory funding bodies and RTOs.</p>
<p>Gov WA</p> <p>Minimum Industry Standards</p> <p>During the webinar there was comment made around high risk minimum industry standards, can you provide details of where and how these minimum standards will be used within the qualifications.</p>	<p>The feedback provider was contacted via telephone and provide details on the references to the Minimum Industry Standards in selected units of competency.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
General Feedback		
Industry Vic	<p>Minimum Industry Standards</p> <p>I just wanted to add some feedback into the pool RE: Minimum Industry Standards being referenced in the Arb Units.</p> <p>Within my organisation I am the Vice Chair of the Arboricultural Leaders Forum. We meet quarterly to discuss all things Arboriculture, both within our business, and within our Industry as a whole. We have spoken about the MIS at the past three meetings, and have all been in agreement that they are good, solid documents, that are needed to support training, policy, and procedure writing in our business, and again, the wider industry. Our National Industry Body (Arb Aus) fully supports the MIS, and I would like to think that the training being offered around our country would reference these standards. This is a great opportunity for our industry to lift, and standardise the training across the country, and I think the MIS have role in that.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
RTO TAS	<p>Minimum Industry Standards</p> <p>After viewing the Minimum Industry Standards proposed for the arboriculture industry in Australia Stakeholder supports the request to have these standards referenced in the new training packages. We believe this is an opportunity to enhance the definition of competency and to promote this definition as a uniform standard across Australia.</p> <p>Additionally the referencing of these standards should promote safe work practices in the industry and help reduce the number of safety incidents nationally.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
Industry NT	<p>General</p> <p>I believe that the proposed qualification and units that I reviewed match industry expectations for competence in the work tasks they describe, and are a positive step forward for training in our industry. I support the release of the qualifications and units as they are currently written.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
General Feedback	
	<p>In addition, I support the explicit reference to the Minimum Industry Standards.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
Industry SA	<p>Minimum Industry Standards</p> <p>I'm writing to offer my feedback on the proposed changes to the arboriculture qualifications.</p> <p>I haven't had time to review the qualifications or units in depth, but I wanted to offer my support for the inclusion of the Minimum Industry Standards in the AHCARB units. Without something like this the same old dodgy RTOs will keep churning out incompetent Arborists and our industry will go nowhere.</p> <p>I support your proposed changes in this matter.</p> <p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
RTO SA	<p>Cert II & Cert III</p> <p>I have reviewed the proposed arboriculture qualifications, as my time is short, I have only reviewed the revised units for Certificate II & III.</p> <p>I believe that the proposed qualification and units that I reviewed and have provided comment, to the most part match industry expectations for competence in the work tasks they describe, and are a positive step forward for training in our industry. I support the release of the qualifications and units.</p> <p>Industry requires an Equipment inspection unit of competency. This not covered adequately in any current UoC.</p> <p>I support the explicit reference to the Minimum Industry Standards.</p> <p>Thanks for your feedback, your support is noted.</p> <p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>

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General Feedback		
Industry WA	<p>Minimum Industry Standards</p> <p>The issue has been raised that there has been some pushback from RTO's in regard to referencing the Minimum Industry Standards in the Arb units. I have personally seen this situation fail here in Western Australia with the RTO's taking control of an industry they are not across the board with. These new training quals need to be driven from the bottom up (industry experts), not the top down (company's making money delivering training). An extreme amount of effort has been put in to the MIN's by industry experts across the Nation to develop some literature that has been derived from years of experience in the field, through successes, failures and trials. I would be extremely disappointed if this was to be the case again, with the RTO's being able to deliver what is best for them and not for the industry, as I thought this was the whole point of revising the quals.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>

AHC2XXXX Certificate II in Arboriculture: General comment

This qualification has not been well supported as evidenced by the low enrolments in recent years. Discussions during the national consultation workshops and feedback from individuals indicated this qualification required a major overhaul. The SMEs provided advice to redesign the qualification to make it shorter and highly focused on entry level machinery operator skills to enable graduates to gain entry level employment as ground-based tree workers in the arboriculture industry. It is envisaged the shorter and more practical qualification will increase the potential for the qualification to be delivered in secondary schools and attract potential entry level workers into the industry.

Feedback received for the reviewed version was considered during the redevelopment. The comments received are listed below.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC2XXXX-Certificate II in Arboriculture		
RTO WA	Electives The time consumed, the cost involved and the arduous task of re scoping and re-registering a new Cert' II. When outcome has not changed.	<p>The Certificate II in Arboriculture has been redesigned to make it shorter and highly focused on entry level machinery operator skills to enable graduates to gain entry level employment as ground-based tree workers in the industry. It has been reduced from 18 to 10 units, all of which are core. The revised qualification should also increase the potential for delivery and completion with senior secondary schools to provide another pathway into the industry and the Certificate III.</p> <p>The 10 core units of the redesigned Certificate II are:</p> <ul style="list-style-type: none"> • AHCARB201 Apply treatments to trees • AHCARB206 Operate and maintain stump grinding machines • AHCARB208 Recognise trees • AHCPGD303 Perform specialist amenity pruning • FWPCOT2236 Fall trees manually (basic) • FWPCOT2237 Maintain chainsaws • FWPCOT2239 Trim and cut felled trees • FWPCOT3238 Operate a pole saw • FWPHAR2206 Operate a mobile chipper/mulcher • HLTAID003 Provide first aid
	Electives Both AHCPGD201 and AHCSOL202 should be core units for cert II. if you don't know about soils or planting trees, it becomes hard to study further advanced units requiring this underpinning knowledge.	
	Electives CPCCCM2010B* Work safely at heights This unit is based on roof access, plumbers / carpenters / tilers etc. Required knowledge, construction terminology. Critical aspect, demonstrate use and inspection of fall barriers and scaffolding. no Arboricultural outcomes	
	Majority of local government and also construction / building sites require CPCCWHS1001 unit / white card for Arboricultural works. No core units in Cert II Arb involving OHS / WHS	
	RIIWH205D - Control traffic with stop-slow bat Advanced traffic control unit, requirements of trainer??? Hard to facilitate	
	Felling of small trees not mentioned in any UOC. suggest; felling of trees using basic techniques.	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC2XXXX-Certificate II in Arboriculture		
	<p>Ref AHCARB302 and AHCPGD303 Both units should not even be considered for Cert II. Specialist amenity pruning as a core unit when Cert III requires only AHCARB303 Perform pruning operations</p>	<p>The reduced size of the qualification and the selection of units were based on the basic operational requirements of a ground based tree worker and reflect a lot of the feedback received. A few of the practical tree work units suggested by feedback respondents have been included, as have the recommendations to leave some of the higher level outcomes out of the Certificate II as they are better suited to the Certificate III (for example – AHCARB302 Inspect trees for access and work and FWPFGM3213 Fall trees manually [advanced]).</p> <p>Many learners already hold the White Card unit prior to enrolling in an Arboriculture qualification. It has not been included any of the redesigned qualifications as industry advised it is not a priority compared to other arboriculture focussed skills units required by industry.</p> <p>Should an individual require higher level skills then it is recommended that the Certificate III qualification should be considered.</p> <p>A number of feedback comments referred to the need to include basic botany, biology and soils relevant for trees. It is important to note that these elements of arboricultural work are embedded in the units of competency and that the Knowledge Evidence component should reflect this. Units have been included in the redesigned qualification to ensure these basic skills are addressed.</p> <p>As part of the feedback received and advice from the SMEs in the redesign the Certificate II, it became apparent that the outcomes of AHCARB210 Work effectively in the arboriculture industry duplicate the outcomes of several other units. This was</p>
Industry Vic	<p>Thoughts: Who is the target group for Cert 2? If the new skill sets are the entry level for people wishing to start in the industry.</p>	
	<p>Core Units lacking botanical, basic plant health knowledge, pests & diseases, plant structure, soil structure.</p> <p>Arboriculture history and law unit could be beneficial as often arborists are expected to resolve conflicts between land owners over tree disputes.</p>	
	<p>"I'd just like to provide some feedback on the Arboriculture Certificate II & III. My training and background is NZ arboriculture certificate IV and I work as an arborist mostly in the private sector currently but I have worked other roles previously. I have provided some comments on the Skills Impact site also but thought i'd be able to supplement those points with an email. I think for both the cert II & III there is a huge lacking of biological education. Having a deep understanding of tree health, biomechanics, structure, how they adapt in different environments, pest and diseases is crucial in becoming an arborist. Without this knowledge one can't thoroughly assess a tree before conducting work or formulate a plan to manage a tree over time. Clients both in the private sector as well as in council expect and prefer to have a qualified arborist who has an understanding of biological processes and tree health and that they can why and how they plan to manage their trees. Anyone can access trees and cut branches without education or qualifications but it takes an arborist to be able to diagnose and rectify any tree health issues. Otherwise I have nothing else to add, the rest of the programme looks suitable for what's expected in the industry. "</p>	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC2XXXX-Certificate II in Arboriculture		
Industry WA	Ref TLIDLIC0005 Licence to operate a boom-type EWP Should rescue and EDD be pre-requisites for this unit?	<p>also identified in the feedback received. Therefore AHCARB210 Work effectively in the arboriculture industry is now proposed for deletion, as well as AHCARB209 Assist with aerial rescue from the ground.</p> <p>The new Basic Tree Worker Skill Set with 5 entry level units (4 of which overlap with the redesigned Certificate II) has also been retained to provide an even shorter pathway for entry level support workers in the industry.</p>
	Ref FWPFGM3213 Fall trees manually (advanced) Would be more appropriate in AQF 3	
	Ref History and Law above comment Agree with 41	
	Ref AHCARB302 and AHCPGD303 Should be AQF 3 as 41 has indicated. In excess of AQF 2 outcomes. Agree with 111 that prune shrubs and small trees is more appropriate. Perhaps this is the most relevant unit to include some basic physiology, anatomy etc	
	Application of chemicals in WA involves additional units to obtain a chemical licence from Health Dept.	
RTO WA	Job outcome in relation to previous version and this version of qualification has not changed and therefore it is unreasonable to deem it a non equivalent qualification.	
	This unit is a Cert 3 Parks and gardens stream level which does not cover the basic of pruning techniques yet sits as a core in cert 2 arb? Prune trees and Shrubs seems more appropriate	
	Assessor requirement for this unit requires from 1 to 3 years of experience in resource and infrastructure sectors?	
Gov WA	Ref History and Law above comment: Disagree with 382 below. This is a cert II level qual. low level tasks only. If really desired, some intro to property rights etc could be included in AHCARB210?	
	Re No more than 2 of the 7 elec.... This is presumably for safety reasons? If so it would be good to state this.	
	Ref AHCARB302 and AHCPGD303; Both these Units are at the AQF3 level and are quite advanced. Should not be core, could be electives, perhaps.	
	Ref AHCARB210 this Unit needed serious attention - which you have done.	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHC2XXXX-Certificate II in Arboriculture		
	At first glance, 18 UoC seems high for a Cert II. Core should be reduced and maybe less electives required.	
	Ref FWPFGM3213 Fall trees manually (advanced) Not sure this Unit should be specified as an elective for Cert II. This is an advanced Unit, requiring considerable exp.	
RTO NSW	If the Minimum Industry Standard documents eg; MIS305 Tree Climbing form part of this training package, why are they not free? If this training package is endorsed, Arboriculture Australia will have a monopoly on the sale of the MIS documents!!!	
	The Elements, PC's, PE's and KE's of the AHCARB210 Work effectively in the arboriculture industry UoC are for the most part simply a replication of the Elements, PC's, PE's and KE's from other units within this qualification. Meaning where a student meets an Element, PC, PE and/or a KE from an alternative UoC already listed, it simply maps across, likewise if a student fails to meet an Element, PC, PE and/or a KE form an alternative UoC. This unit represents a checklist only and should be deleted from the Certificate II qualification. It has no real learning value that is not represented in other UoC's.	
	Anyone who has read through the Elements, PC's, PE's and KE's of the AHCARB302 Inspect trees for access and work UoC can see that it far exceeds the requirements of a level 2 course. To put this into perspective, it is currently a pre-requisite unit for the Diploma. This unit should be deleted from Certificate II Arboriculture and should not even be an elective option.	
	Soil, and soil condition is consistently misunderstood and often dismissed as critical. As such, I agree with 460 that AHCSOL202 Assist with soil or growing media sampling and testing UoC should be a core unit for certificate II as it is imperative that certificate II students have a broad understanding of plant health and development. However, as important as stock selection, site preparation, planting techniques and establishment periods are, I don't agree that AHCPGD201 Plant trees and shrubs should be a core UoC, I believe it should remain an elective.	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHC2XXXX-Certificate II in Arboriculture		
	<p>The Elements, PC's, PE's and KE's of the current AHCARB303 Perform pruning operations are most appropriate for the arboriculture industry. The UoC AHCPGD303 Perform specialist amenity pruning should be deleted and the current UoC AHCARB303 Perform pruning operations reinstated.</p>	
RTO NSW	<p>Cert 2 Arb is culled back to just 12 core units (no electives) my suggestions would be:</p> <p>AHCARB201 Apply a range of treatment to trees AHCARB206 Operate and maintain stump grinding machines AHCARB207 Perform ground based rigging AHCARB208 Recognise trees AHCARB209 Assist with aerial rescue from the ground AHCARB303 Perform pruning operations FWPCOT2236 Fell trees manually basic FWPCOT2237 Maintain chainsaws FWPCOT2239 Trim and cut felled trees FWPCOT3228 Operate a pole saw FWPHAR2206 Operate mobile chipper/ mulcher HLTAID003 Provide first aid</p>	
RTO NSW	<p>Stakeholder agrees with 's comments above re electives: I agree re Cert 2 units, and am pleased you included AHCARB201 Apply a range of treatment to trees, and retained FWPCOT2236 Fell trees manually basic.</p>	
RTO Qld	<p>While discussing the Cert III, developer asked for feedback re the Cert II. This is stakeholders response: Regarding the proposed certificate II please be advised that there is no funding for this level in Queensland therefore we feel that it will not be taken up.</p> <p>This ground based at Certificate III level should be the entry level for arboriculture."</p>	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC2XXXX-Certificate II in Arboriculture		
RTO SA	<p>I would also like to add, a proposal for a <u>short Cert III</u> was shown, which I thought was good, consisting of the following units (from memory);</p> <ul style="list-style-type: none"> HLTAID003 Provide first aid AHCARB207 Perform ground based rigging FWPCOT2237 Maintain chainsaws FWPCOT2239 Trim and cut felled trees FWPFGM Operate a mobile chipper/mulcher FWPCOT2236 Fall trees manually (basic)* (I suggested this additional unit during the consultation workshop). 	

AHC3XXXX Certificate III in Arboriculture

Overall the feedback provided support for the Certificate III and after consideration of the feedback, minor changes have been made to the qualification. The reference to a ground based arborist has been removed from the Qualification Description. In the Electives, AHCARB403 Perform ground based tree defect evaluation has replaced AHCWRK305 Coordinate work site activities in the Leading hand specialisation, with the latter being listed in the General Electives.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture		
RTO NSW	Re Specialisations way to many specialties	The SMEs advised that the core and specialisations reflect the industry job outcomes and as such have been retained.
	As with all other CIII horticulture courses there are no pre-requisite entry requirements and still have the same underpinning knowledge requirements. RTO/Assessors must comply with unit requirements and AQSA.	As this is a trade level qualification the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification.
	Why Do we have AHCPMG301 control weeds in the unit list when AHCPMG302 Control plant pest, diseases and disorders, would be a better choice.	Both AHCPMG301 Control weeds and AHCPMG302 Control plant pests, diseases and disorders are now listed as elective units.
RTO WA	Direct entry into Cert' III without any underpinning knowledge of Botany, Soils, P&D etc can lead to students being overwhelmed and set up for failure. There is a need for underpinning knowledge of some Cert II units before Cert III entry.	As this is a trade level qualification the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification. Where appropriate, units of competency have underpinning knowledge built in to the Assessment Requirements under the Knowledge Evidence component.
Industry Vic	Ref No ground based option 430. There is a "Leading hand" specialisation on the next page.	The issue of creating a Ground based arborist specialisation other than the Leading hand was considered at length by the SMEs and not supported. They were satisfied that the majority of a ground based worker's functions aligned with Certificate II that covers the skills and knowledge for a ground-based tree workers in the arboriculture industry.
	*Update name. Use Arborist climbing techniques. Surely "Basic tree climbing" should stay a stand-alone unit.	The unit title has been corrected in the qualification.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture		
		AHCARB307 Use basic climbing techniques has been revised and retitled as AHCARB3XX Access trees for inspection and ecology.
Industry Tas	<p>Providing a crane competency to those just beginning their careers in my opinion is ridiculous. Crane work is high risk and should only be performed by those with years of experience and proven expert skills and abilities in climbing and cutting techniques. I think having formal training is important for crane work but should be initiated and provided by employers to suitable workers.</p>	The SMEs advised that RTOs should structure delivery of the Crane specialisation later in the sequencing of training program. The crane specialisation requires completion of Climbing specialisation and/or EWP specialisation. These units should be completed before attempting the crane specialisation. This advice will be provided in the Implementation Guide.
	<p>This certificate is lacking botanical knowledge, pests & diseases, tree structure/biomechanics.</p> <p>I think in order to assess/inspect a tree and perform pruning this information should be covered.</p> <p>Without an in depth understanding of biology there isn't a great difference between a 'qualified arborist' and a 'tree lopper'.</p>	Within units of competency, the knowledge requested by the feedback provider is covered where appropriate in the Knowledge Evidence of the unit's Assessment Requirements.
	<p>Cert II not a pre-requisite for this course?? What's stopping students from going straight into the Cert III?</p>	As this is a trade level qualification, the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification.
	<p>I think for both the cert II & III there is a huge lacking of biological education. Having a deep understanding of tree health, biomechanics, structure, how they adapt in different environments, pest and diseases is crucial in becoming an arborist. Without this knowledge one can't thoroughly assess a tree before conducting work or formulate a plan to manage a tree over time. Clients both in the private sector as well as in council expect and prefer to have a qualified arborist who has an understanding of biological processes and tree health and that they can why and how they plan to manage their trees.</p>	Within units of competency, the knowledge requested by the feedback provider is covered where appropriate in the Knowledge Evidence of the unit's Assessment Requirements.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHC3XXXX Certificate III in Arboriculture		
<p>Anyone can access trees and cut branches without education or qualifications but it takes an arborist to be able to diagnose and rectify any tree health issues.</p> <p>In the certificate III there has been an addition of the 'Crane Specialisation' as an elective. I don't agree with offering these modules to those with so little experience working with trees.</p> <p>Crane assisted tree removal is high risk work and the consequences of miscalculations often are catastrophic. I believe crane work should only be conducted by those with years of experience in the trade with an aptitude for big work.</p> <p>I think it's great having the formal qualification as it would give the student a great base competency in the task rather than learning solely from a leading hand or business owner who might be subject to poor practices.</p> <p>Otherwise I have nothing else to add, the rest of the programme looks suitable for what's expected in the industry.</p>	<p>See above comment on crane work.</p>	
RTO Qld	<p>There is no ground based option for individuals who do not wish to work above ground but require a certificate III in arboriculture to expand and grow their businesses and be a licensed member of the AA.</p>	<p>A ground based option is provided through the Leading hand specialisation.</p> <p>The issue of creating a Ground based arborist specialisation other than the Leading hand was considered at length by the SMEs and not supported. They were satisfied that the majority of a ground based worker's functions aligned with Certificate II that covers the skills and knowledge for a ground-based tree workers in the arboriculture industry.</p>
	<p>I agree with concerns that with no entry requirements students with little experience will be able to select this option and become qualified in a much specialised area that requires considerable experience and expertise usually gained from time served in industry. This area should stay within the specialised RTO organisations.</p>	<p>As this is a trade level qualification the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture		
Industry WA	In WA, powerline work must comply with the code of practice for Personnel Electrical Safety for Vegetation Control Work Near Powerlines and as such this stream is inadequate. Leave it to the UET TP and delete this stream.	While one state may see these as restrictions and not relevant, other States have advised the Utility arborist specialisation will address a key training shortage. The SMEs advised to retain this specialisation.
	It seems impossible to have just 1 specialisation. So how specialised are you if you have 3 specialisations.	<p>The qualification was designed to cover several job specialisations and requires at least one of the following specialisations to be selected:</p> <ul style="list-style-type: none"> • Certificate III in Arboriculture (Climbing arborist) • Certificate III in Arboriculture (Crane specialist) • Certificate III in Arboriculture (Elevated Work Platform – EWP) • Certificate III in Arboriculture (Utility Arborist) • Certificate III in Arboriculture (Environmental arborist) • Certificate III in Arboriculture (Leading hand) <p>It is possible to achieve up to three specialisations within the packaging rules as the specialisations share some common units. Industry advice is supportive of this.</p>
	<p>I understand that the previous AQF 3 was confusing, however this revision has 4 more streams that are inadequately supported by the electives providing specialisations in multiple streams at the end of 1 year. The outcome may be to dilute the professionalism of the industry qualification system within the industry and in the public arena.</p> <p>I perceived the log book system for climbing to be time consuming for supervisors and perhaps problematic however it went some way to collecting sufficient evidence that a variety of trees, scenarios, techniques and equipment were used to demonstrate a comprehensive competency as opposed to "Competent at the time of assessment".</p> <p>Furthermore the number of streams and costs are potentially an obstacle for RTOs to deliver.</p> <p>The RTO in WA chose not to deliver the EWP stream because stating cost as a factor, however they also didn't deliver the Ground</p>	<p>Advice and support for the specialisations has been strong and as such will be retained.</p> <p>Training Package qualifications identify job outcomes that industry require to fulfil skills needs. The specialisations are based on job functions within this industry.</p> <p>While we understand the funding concerns, funding is not part of the national project process and issues of funding, nominal hours and training duration are the responsibility of State or Territory funding bodies and RTOs.</p> <p>RTOs are contracted to deliver training on behalf of industry and government to fulfil these skills needs. The majority of RTOs who provided feedback on the qualification and its related units support its design.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
	<p>based stream which the same reasoning could surely not be applied. Curious? And as already mentioned, there is no Ground Based stream despite being mentioned.</p> <p>SMEs has advised that the qualification and the specialisations should not be changed from:</p> <ul style="list-style-type: none"> • Certificate III in Arboriculture (Climbing arborist) • Certificate III in Arboriculture (Crane specialist) • Certificate III in Arboriculture (Elevated Work Platform – EWP) • Certificate III in Arboriculture (Utility Arborist) • Certificate III in Arboriculture (Environmental arborist) • Certificate III in Arboriculture (Leading hand) <p>The issue of creating a Ground based arborist specialisation other than the Leading hand was considered at length by the SMEs and not supported. They were satisfied that the majority of a ground based worker’s functions aligned with Certificate II that covers the skills and knowledge for a ground-based tree workers in the arboriculture industry. Therefore the reference to a ground based arborist has been removed from the Certificate qualification.</p>
<p>Agree with 460. In addition, RTOs/assessors are under pressure and may dumb down the assessments as a result of the students lack of underpinning knowledge and experience.</p>	<p>As this is a trade level qualification the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification.</p> <p>Assessments Requirements have been revised in all units that reflect AQF level 3 outcomes and made more rigorous to reflect the skills and knowledge outcomes required by industry. RTOs are required by the Standards for RTOs 2015 to assess individuals at the level prescribed in the units of competency and their Assessment Requirements.</p>
<p>Both UET units should be included in the Utility stream.</p>	<p>SMEs advised to leave the Utility arborist specialisation as it stands.</p> <p>Utility arborist:</p> <ul style="list-style-type: none"> • UETTDREL13A Comply with sustainability, environmental and incidental response policies and procedures

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
	<ul style="list-style-type: none"> • UETTDREL14A Working safely near live electrical apparatus as a non-electrical worker • UETTDRCVC23A* Plan the removal of vegetation up to vegetation exclusion zone near live electrical apparatus • UETTDRCVC27A* Monitor safety compliance of vegetation control work in an ESI environment • Elective units • UETTDRCVC24A* Access vegetation and recommend control measures in an ESI environment • UETTDRCVC26A* Cut vegetation at ground level near live electrical apparatus • UETTDRCVC33A* Apply pruning techniques to vegetation control near live electrical apparatus <p>Elective units have been included for those who wish to focus on the utilities sector.</p> <p>SMEs also advised that should individuals wish to only work in this sector exclusively the ESI training pathway may be a better training option.</p>
	<p>AHCARB505A Document and audit tree work was recently an AQF 5 unit, now downgraded to AQF 4 and available to AQF 3. Seems like a significant lowering of standards and inappropriate for AQF 3 outcomes.</p> <p>All of the AHCARB units of competency have been designed to reflect specific work functions and the AQF level identifier assigned to each unit reflects how that units aligns with the AQF. It is unclear which unit the feedback is referring to as AHCARB505A Document and audit tree work remains a level 5 units and is listed in the Diploma and not the Certificate III. There are four AHCARB level 4 units listed in the Electives of the Certificate III, and the units and their assessment requirements reflect the complexity of AQF level 4, and as such must be assessed according.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
<p>As implied by 382, there is no impetus for employers to enroll students into AQF 2. This could potentially reduced enrollments and produce trade level arborists with less underpinning knowledge. AQF 2 may risk being deleted for the same reason as AQF 4 as it is a qualification for no viable outcome.</p>	<p>As this is a trade level qualification the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification.</p> <p>Refer to the comments above on the redesigned Certificate II which industry SMEs advised should increase the numbers of people gaining entry level roles within the industry.</p>
<p>Not a single unit where the pruning of vegetation in an energised environment is assessed yet the student will be considered a specialist? Consider also that there is no UET climbing unit in this specialisation. Or do we need yet another stream for Utility climbing arborist?</p>	<p>Advice was received that the safety aspects should be embedded in each unit to ensure the content is assessed in the context of the unit.</p> <p>Where appropriate, knowledge related to pruning of vegetation in an energised environment has been added to the Knowledge Evidence of selected units. An Energy Regulator in one State reviewed several level 3 units in relation to this matter and advised they were satisfied this important information was adequately covered in the revised units.</p>
<p>Ref Core units Only 4 units will be required if the student has completed AQF 2. Consider making those five units available in AQF 2 pre-requisites for AQF 3? Do they really meet AQF 3 outcomes?</p>	<p>The Certificate II in Arboriculture has been redesigned to cater for new entrants into the arboriculture industry.</p> <p>See comment in Certificate II Arboriculture section.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
	<p>The problem with having less units and no AQF 2 pre-requisite is that a student can enter the industry and after 1 year become a supervisory arborist at trade level. By insisting upon AQF 2, it provides the student time to apply and hone the training received to achieve a level of experience with various scenarios that would provide a greater consistency of arborist. Great care must be taken to maintain the value of the qualification.</p>
<p>Ref Dismantle trees This unit is common for 3 specialisations however requires different techniques for each stream. To be competent in this unit for 1 stream does not equate to competent in other streams and needs further consideration to maintain the integrity of the unit for the context.</p>	<p>As this is a trade level qualification the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification.</p> <p>The Certificate II in Arboriculture has been redesigned to cater for new entrants into the arboriculture industry.</p> <p>It is a requirement of RTOs that enrol learners in to the Certificate III to ensure the learners have the foundation to succeed in the qualification prior to entry and/or support learners to successfully develop the skills and knowledge required to achieve the qualification.</p> <p>RTOs will need to contextualise the training and assessment of the dismantle trees unit to reflect the specialisations chosen by the learner when developing the learner's training plan.</p> <p>Advice will be provided in the Implementation Guide to reflect this.</p>
<p>Ref: to Use arborist climbing techniques Previously having Standard Tree Climbing and Perform above ground pruning in AQF 2 provided training in basic tree climbing skills that could permit the student time to apply and hone skills prior to undertaking Advanced tree climbing. Is the completion of 1 climbing specific unit sufficient to assess the student as competent as Advanced? Bear in mind that dismantle trees is probably using spikes.</p>	<p>The existing units - AHCARB307 Use advanced climbing technique and AHCARB312 Basic climbing techniques have been combined into one unit - AHCARBXXX Use arborist climbing techniques to reflect real work practices. The SMEs also advised that a climbing arborist will need to achieve all the outcomes of both units since this is the industry expectation of a climbing arborist.</p> <p>RTOs will need to modify their training and assessment strategies to ensure learners develop competence in all the outcomes of the new unit, including practice and formative assessment before undertaking summative assessment.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
	The Assessment requirements for AHCARBXXX Use arborist climbing techniques have also been refined to ensure sufficient evidence is collected before an RTO makes a judgement of an individual's competency.
The 2016 Training package did not install a prerequisite for AQF 3 however if students had not completed AQF 2, they had to complete certain units that were deemed as essential for underpinning knowledge during the AQF 3.	As this is a trade level qualification the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification.
Agree with 382 et al. Grossly inadequate for a person with potentially 1 years experience.	<p>The SMEs advised that RTO's should structure delivery of the Crane specialisation later in the sequencing of student's training plan.</p> <p>Advice will be provided in the Implementation Guide to recommend to RTOs that learners complete the EWP units or Use arborist climbing techniques unit, before Use cranes to access and dismantle trees is undertaken.</p>
Totally agree with 111. It is difficult to envisage a person with 1 years' experience to be at trade and supervisory level. Consider deleting stream in exchange for a skills set at AQF 4.	<p>The leading hand stream may be selected by experienced arborists seeking certification or people transitioning from related sectors – for example - forestry workers. Employers would also consider the employee who they would direct into this specialisation.</p> <p>Advice will be provided in the Implementation Guide to sequence delivery of this specialisation toward the end of the learner's training plan.</p>
These 3 UET units should be in the Utility specialist stream.	The units three UET units in the General Electives (UETTDRVC24A* Access vegetation and recommend control measures in an ESI environment, UETTDRVC26A* Cut vegetation at ground level near live electrical apparatus, UETTDRVC33A* Apply pruning techniques to vegetation control near live electrical apparatus) can be selected by

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture		
		anyone, including learners that are undertaking the Utilities specialisation.
	Once all the UET units and pre-requisites are included, is the student better off doing the UET qualification separately? Is the AHC trying to encompass too much?	It is acknowledged that there overlap with the units available in UET20312 Certificate II in ESI - Power line Vegetation Control, but The SMEs advised to leave the Utility arborist specialisation as it stands, as it allows arborists to gain competency in sufficient UET units to undertake work on vegetation around power lines, as required by the Utility Companies. It is also acknowledged that individuals that wish to only work around power lines may be a better off completing UET20312 Certificate II in ESI - Power line Vegetation Control
RTO SA	Re Utilities specialisation Are we complicating this, 7 specialisations?	SMEs advised that this reflects the industry job outcomes and as such will be retained
	Re Crane specialist Support 382 comments regarding crane specialist stream. Requires experience. Remove Group B and become elective.	The SMEs advised that RTO's should structure delivery of the Crane specialisation later in the sequencing of student's training plan. Advice will be provided in the Implementation Guide to recommend to RTOs that learners complete the EWP units or Use arborist climbing techniques unit, before Use cranes to access and dismantle trees is undertaken.
	Requires an Equipment inspection unit of competency for thorough examination of arboricultural equipment. We encourage equipment inspection, pre use checks and interim inspections and have no /minimal education on this yet there is a wide range of arb equipment available for use. Current units do not cover this adequately.	Equipment checks have been included in each of the relevant units of competency. However AHCARB404 Conduct a safety audit is available as an elective unit.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture		
RTO WA	No change in job outcome from previous Cert 3 to this version . Introduction of specialization streams does not result in a change of job role for a trade level Cert 3 Arborist.	The revised qualification includes several units and streams that are not available in the existing qualification, including two new units and several units taken from the deleted level four qualification to create a leading hand specialisation. On the basis of these added outcomes, the revised qualification is not equivalent to the existing.
	This should sit as a skills set at Cert IV level (as per units AQF level). The impact to include these as electives in Cert 3 would mean that 'leading hand ' specialist would exit cert 3 with less practical units than other 'specialist' or 'general' cert 3 arborists.	SMEs felt that this stream would be focussed on employees transitioning from another related sector e.g. forest worker. Employers should also consider the employee who they would direct into this specialisation. RTOs should also consider their scheduling for this specialisation. SMEs advised to retain this specialisation with advice to be provided in the Implementation guide on sequencing this specialisation towards the end of a training plan.
	Unit AHCARB307 is referenced on page 2 as "Use advanced climbing techniques"	Error corrected.
RTO SA	The MIS should be referenced as they are an industry recognised document, reviewed and promoted by more than people involved with Arb Aus. They are a valuable training guide and as a "standard" recognised by industry they need to be referenced. It's not as if Arb Aus will make every student buy them, there will be subscription options for both RTO's and students whereby they can be accessed easily for a very reasonable price (especially when compared to standard prices in other industries)	Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry. Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHC3XXXX Certificate III in Arboriculture		
	<p>I don't believe students require the level 2 or any underpinning knowledge to enrol. RTO's should take the time to guide their students through the course. If they are having enough contact days then it should not be an issue.</p>	<p>As this is a trade level qualification the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification.</p> <p>The Certificate II has been redesigned to cater for new entrants into the arboriculture industry.</p>
	<p>There needs to be some kind of kit inspection course, whether it is an elective, part of a specialisation or core. I would learn towards part of a specialisation in climbing and ewp and possibly leading hand.</p> <p>I would suggest a slightly diluted version of PUAEQU001B & MEM15004B</p>	<p>Equipment checks have been included in each of the relevant units of competency. However AHCARB404 conduct a safety audit is available as an elective unit.</p>
	<p>I believe the specialisations are a great idea, it gives students a wider range of what they want to do. Though i do believe there needs to be some kind of groundsman specialisation or make it so that you do not have to choose a specialisation and leave it open providing they don't choose more than 2 level 2 units, as it leaves out a number of people in the industry</p>	<p>Ground based option is provided through the Leading hand specialisation. Recommendations were sought on what constitutes a Level 3 ground based worker. No advice was presented.</p> <p>SMEs discussed and were satisfied that the majority of ground based workers aligned with AQF 2 work outcomes. The Certificate II has been redesigned to cater for new entrants into the arboriculture industry.</p>
RTO NSW	<p>If the Minimum Industry Standard documents eg; MIS305 Tree Climbing form part of this training package, why are they not free? If this training package is endorsed, Arboriculture Australia will have a monopoly on the sale of the MIS documents!!!</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
	Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.
I agree with 382 and 430 regarding the Crane specialist option.	SMEs advised that RTO's should structure delivery of the Crane specialisation later in the sequencing of student programs. The crane specialisation requires completion of Climbing specialisation and/or EWP specialisation. These units should be completed before attempting the crane specialisation. Advice will be provided in the Implementation guide.
Fantastic to see ACHARB301 Implement a tree maintenance program, which contains significant underpinning theory, listed as a core UoC in Certificate III.	Thanks for your feedback, your support is noted.
As Certificate III is Trade Level, I am in favour of students being able to enrol into Certificate III without Certificate II completion being a pre-requisite entry requirement.	As this is a trade level qualification the SMEs considered there was no need for entry requirements since apprentices are frequently recruited directly without a prior qualification. The Certificate II has been redesigned to cater for new entrants into the arboriculture industry.
Ref Packaging rules: I agree with the reduction of 23 UoC's to 18 UoC's.	Thanks for your feedback, your support is noted.
RTO Qld	A ground based option is provided through the Leading hand specialisation. The issue of creating a Ground based arborist specialisation other than the Leading hand was considered at length by the SMEs and not supported They were satisfied that the majority of a ground based worker's functions aligned with Certificate II that covers the skills and knowledge for a ground-based tree workers in the arboriculture industry.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
<p>but the Arboricultural Association does not recognise the Certificate II in their licensing structure neither do councils and corporations tendering for tree works. All treework contracts state that company's staff must have a minimum of Certificate III. Statistics show that the Certificate II like the Certificate IV are not considered as a required qualification for our industry.</p> <p>If there is not an option included for a trade level qualification Ground Based Certificate III then it will severely disadvantage these students at entry level and also leave no option for older students that may just want to work in industry as a "ground based" operative and be qualified at a recognised level.</p> <p>Therefore we would like to propose an additional specialisation stream for the ground based working arborist within the Certificate III in Arboriculture.</p>	
<p>Regarding Certificate III arboriculture.</p> <p>Please note you have AHCARB207 Perform ground based rigging listed as a core and also as an elective which may be a typing error, please could you advise where this unit sits.</p> <p>The WHS unit CPCCOHS2001A you have listed has been superseded by CPCCWHS1001 Prepare to work safely in the construction industry.</p> <p>We would propose the following option for the ground based stream specialisation Group H?</p> <p>Completion of the Nine core units Complete these three units for the specialisation</p> <p>AHCARB210 - Work effectively in the arboriculture industry CPCCWHS1001 Prepare to work safely in the construction industry AHCWRK305 Coordinate worksite activities</p> <p>Then complete a further six elective units to make up the 18 units overall.</p>	<p>A ground based option is provided through the Leading hand specialisation.</p> <p>The issue of creating a Ground based arborist specialisation other than the Leading hand was considered at length by the SMEs and not supported They were satisfied that the majority of a ground based worker's functions aligned with Certificate II that covers the skills and knowledge for a ground-based tree workers in the arboriculture industry.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHC3XXXX Certificate III in Arboriculture		
	<p>Regarding the proposed certificate II please be advised that there is no funding for this level in Queensland therefore we feel that it will not be taken up.</p> <p>This ground based at Certificate III level should be the entry level for arboriculture.</p>	
	<p>Specialist Elective Units: Group B Crane Specialist Concerns are that with no entry requirements students with little experience will be able to select this option and become qualified in a much specialised area that requires considerable experience and expertise that usually can only be gained from considerable time served in industry. We feel that crane access if it is to be included within the Certificate III there must be some pre req or evidence of industry time served requirement due to the specialised nature and the high skill levels required. Candidates wishing to have this specialisation option should be encouraged to demonstrate for example at least five years industry experience working at heights with trees.</p>	<p>SMEs advised that RTO's should structure delivery of the Crane specialisation later in the sequencing of student programs. The crane specialisation requires completion of Climbing specialisation and/or EWP specialisation. These units should be completed before attempting the crane specialisation.</p> <p>Advice will be provided in the Implementation guide.</p>
RTO Qld	No more than 15 UOCs should apply or you have a double Qualification as in the Cert III in Arboriculture now	Based on SME advice, the qualification has been no been changed and remains at 18 units (significantly reduced from 23 in the existing qualification).
RTO NSW	Crane specialisation has pre requisites of AHCARB305 Dismantle trees and AHCARB307 Use advanced climbing techniques Dismantle trees unit we keep required climbing hours at a total of 200 hours logged (we use skills Tracker – excellent and auditable) {previous total of 400 was ridiculous though we have had most achieve it by extending their enrolment 6 months – 200 I feel is achievable, having '0' hours is a step backwards and somewhat a liability}.	<p>The prerequisites for Crane are CPCCDO3011A Perform dogging and CPCCOHS2001A Apply OHS requirements, policies and procedures in the construction industry.</p> <p>The SMEs advised that RTO's should structure delivery of the Crane specialisation later in the sequencing of student's training plan.</p> <p>Advice will be provided in the Implementation Guide to recommend to RTOs that learners complete the EWP units or Use arborist climbing techniques unit, before Use cranes to access and dismantle trees is undertaken.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture		
		There is no requirement to retain a logbook. Individuals should be provided with sufficient practice by RTO's or employers until the individual is ready for assessment.
Industry Vic	<p>Qualifications Description: Ground-based arborist referenced – if ground-based arborist stream has been removed this will also need to be removed. Also The work involves high risk operations either working at heights, working near utilities or conducting support works to individuals working above ground What does support works entail?</p>	<p>Reference to 'ground based' has been removed from Certificate II in Arboriculture descriptor.</p> <p>A ground based option is provided through the Leading hand specialisation.</p> <p>The issue of creating a Ground based arborist specialisation other than the Leading hand was considered at length by the SMEs and not supported. They were satisfied that the majority of a ground based worker's functions aligned with Certificate II that covers the skills and knowledge for a ground-based tree workers in the arboriculture industry.</p> <p>Support works refers to the tasks carried out by other arborists on the ground to assist arborists working above the ground.</p>
	Do we have data available on how many crane operators are currently in the industry vs ground-based operators?	<p>This unit has not existed before so enrolment figures won't be available. Anecdotal evidence from workshops around the country indicates that Queensland and Northern Territory have a demand. New South Wales also indicated that there was a need but training was only currently available in Northern Territory.</p> <p>See above for comment on ground based arborist.</p>
	<p>Specialist Elective Units: Group D Utility Arborist: The elective units for the utility arborist consist of UETTDREL13A, UETTDREL14A, UETTDRVC23A and UETTDRVC27A – seeking clarification as to what AQF level these units are categorised as?</p> <p>During the Melbourne workshop it was discussed that the reason only 2 elective units could be at an AQF level 2 was due to weighting; and therefore, the qualification would/could be deemed</p>	<p>Units requested fit in the following qualifications:</p> <ul style="list-style-type: none"> • UETTDREL13A – Used only in Certificate II ESI • UETTDREL14A – Used in 21 qualifications that range from Certificate II to Advanced Diploma • UETTDRVC23A – Used only in Certificate II ESI • UETTDRVC27A – Used only in Certificate II ESI

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
	<p>an AQF level 2. If the four units for Utility Arborist are considered to be at a level lower than the prescribed AQF level 3, plus the three AQF level 2 core units, plus another 2 elective units from Group G at AQF level 2 would equate to 9 of the 18 units to be deemed at AQF level 2."</p>
Industry NT	<p>I have some comments as feedback regarding the presentation of Arboriculture skill set. During my time in business and in the industry climbing trees is always a secondary measure to carry out tree maintenance. First measure is from the ground or with Cherry picker, etc.</p> <p>When the cherries can't be picked from the ground or with mechanical aid then climbing the tree would be enabled.</p>
	<p>The SMEs discussed this issue and resolved that although these units are typically associated to the Certificate II ESI qualifications, the unit outcomes also fit well within AQF3, and as such would not degrade the Certificate III in Arboriculture.</p>
	<p>If we were able to keep the ground-based arborist stream this may help the small operators that are stump grinding, chipping and providing an all-inclusive service to their clients. By swapping the FWRHAR2206 unit for the FWPHAR3215 chipper unit it will assist with the AQF level 2 issues. It does not stipulate the size of the machine that is required for assessment which leaves it open to interpretation. Otherwise the knowledge evidence and majority of the assessment conditions are fairly similar.</p> <p>Unfortunately, due to work commitments I haven't been able to dedicate the time I would have liked to analyse the package and units. Happy to discuss any of the above comments.</p>
	<p>The application of FWPHAR3215 Operate a heavy production mobile chipper specifically applies to the operation of heavy production mobile chipping unit to chip logs or tree lengths on-site during forest harvesting operations.</p> <p>SMEs felt that the unit was not appropriate for the Certificate III in Arboriculture.</p> <p>A ground based option is provided through the Leading hand specialisation.</p> <p>The issue of creating a Ground based arborist specialisation other than the Leading hand was considered at length by the SMEs and not supported. They were satisfied that the majority of a ground based worker's functions aligned with Certificate II that covers the skills and knowledge for a ground-based tree workers in the arboriculture industry.</p>
	<p>Thanks for your feedback, your support is noted.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHC3XXXX Certificate III in Arboriculture		
	<p>The skill of climbing is great and should be kept to minimum and secondary use, (this is just my opinion). Many tree guys would disagree. There's a lot of bravado that comes along with these skills.</p> <p>Industry needs to have choice of how to manage aerial work on trees so use of Mechanical means (cherry picker, etc.) should be an option and combination of both could be used when necessary and not as a necessity.</p> <p>Keep up the good work.</p>	
Industry NSW	<p>Via external questionnaire Question;</p> <p>1/ Is a qualification of Arborist (ground worker) a trade level AQF3 agreeable with you? No.</p> <p>2/ Is the qualification Supervising Arborist exempt climbing experience agreeable with you? No</p> <p>3/ Is the qualification Environmental Arborist suitable to your operations and as a trade level? NO</p> <p>3/ Would your business support 18 months training time to achieve these qualifications? NO</p> <p>4/ What type of Arborist do you require mostly to operate effectively and support WH&S options?</p>	<p>Questionnaire was reviewed with Stakeholder during the SMEs meeting and issues were raised for each.</p> <p>Outcomes included:</p> <p>1. Ground based option is provided through the Leading hand specialisation. Recommendations were sought on what constitutes a Level 3 ground based worker. SMEs discussed and were satisfied that the majority of ground based workers aligned with AQF 2 work outcomes.</p> <p>2. Supervising arborist is likely to be a climbing arborist but there are exceptions and this specialisation allows for this to occur. E.g. workers transitioning from a related field e.g. forest worker.</p> <p>3a. Environmental arborist is a new sector of the industry and by including a specialisation this will provide opportunity for this sector to develop further.</p> <p>3b. It is expected that training would occur as part of a 3 year apprenticeship or traineeship.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
	Cert qualified climbing arborist to climb at least medium difficulty trees and capable of groundsman duties as well
Industry NSW	<p>Via external questionnaire Question;</p> <p>1/ Is a qualification of Arborist (ground worker) a trade level AQF3 agreeable with you? No.</p> <p>2/ Is the qualification Supervising Arborist exempt climbing experience agreeable with you? No</p> <p>3/ Is the qualification Environmental Arborist suitable to your operations and as a trade level? NO</p> <p>3/ Would your business support 18 months training time to achieve these qualifications? Yes to certain aspects</p> <p>4/ What type of Arborist do you require mostly to operate effectively and support WH&S options? Climbing arborist/supervising arborist Property Maintenance sector</p>
Industry NSW	Via external questionnaire Question;
4. The skills highlighted by the respondents can be achieved with either the Certificate II for ground based workers or Certificate III for Trades persons.	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
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AHC3XXXX Certificate III in Arboriculture

1/ Is a qualification of Arborist (ground worker) a trade level AQF3 agreeable with you?
 No.

2/ Is the qualification Supervising Arborist exempt climbing experience agreeable with you? No

3/ Is the qualification Environmental Arborist suitable to your operations and as a trade level?
 NO

3/ Would your business support 18 months training time to achieve these qualifications?
 Depends on what previous experience is bought to the table. If none then yes

4/ What type of Arborist do you require mostly to operate effectively and support WH&S options?
 Experienced

Industry NSW

Via external questionnaire

1/ Is a qualification of Arborist (ground worker) a trade level AQF3 agreeable with you?
 YES/No. **(NO)

2/ Is the qualification Supervising Arborist exempt climbing experience agreeable with you? **(NO)

3/ Is the qualification Environmental Arborist suitable to your operations and as a trade level?
 YES / NO **(NO)

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHC3XXXX Certificate III in Arboriculture	
<p>3/ Would your business support 18 months training time to achieve these qualifications? YES/ NO ** (NO)</p> <p>4/ What type of Arborist do you require mostly to operate effectively and support WH&S options? I require mostly an all rounder arborist that is capable of completing ground work in a professional manner (eg- rigging/rope work, ground based felling, organising ground crew and working with climbing arborist if the job has a need for one), have a good understanding of trees and there aspects and growth, and be able to complete some basic/intermediate tree prunes/removals either by climbing or with use of an EWP.</p>	

AHC4XXXX Certificate IV in Arboriculture

Overall the feedback was supportive of the deletion of this qualification from the training package.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC41916 Certificate IV in Arboriculture – Tagged for deletion		
Gov Vic	<p>Definition of suitably qualified arborist [Stakeholder] discussed the definition of a "suitably qualified arborist" with Skills Impact at a workshop. He has found the definition in the Electricity Safety Regulations 2015 document: "suitably qualified arborist" means an arborist who has - a) the qualification of National Certificate Level IV in Horticulture and Arboriculture, including the "Assess Trees" module, or an equivalent qualification; and b) at least 3 years of field experience in assessing trees.</p> <p>His comments on this definition are: "suitably qualified arborist" which currently relies on a Certificate IV and the old "Assess Trees" module, which presents some obvious need for change.</p>	<p>Developer and Skills Impact met with Government stakeholder Victoria and clarified the Industry's position on the Certificate IV in Arboriculture.</p> <p>Australian Standards refers to a qualified Arborist as a person holding the Certificate III in Arboriculture.</p> <p>Gov Vic requested that the Unit <i>AHCARB403 Perform a ground based tree defect evaluation</i> be included in the electives of the Certificate III in Arboriculture and this should satisfy their regulatory requirements.</p> <p><i>AHCARB403 Perform a ground based tree defect evaluation</i> has been added to the Leading hand specialisation and is available as an elective unit of competency.</p>
Gov WA	<p>The Certificate IV in Arboriculture is proposed for deletion. [Stakeholder] has no problems with the deletion of this qualification as there are no enrolments in Western Australia nor does there appear to be any enrolments across Australia.</p>	<p>Thanks for your feedback, your support is noted.</p>
Gov WA	<p>Just a quick email to confirm that we support the logic of deleting the above qualification.</p>	<p>Thanks for your feedback, your support is noted.</p>

AHC5XXXX Diploma in Arboriculture

Some feedback suggested the addition of work experience as well as the three level 3 units of competency as entry requirements. The entry requirements have not been changed as the SMEs advised the three level 3 units provide sufficient depth of arboriculture knowledge to succeed in this qualification. Overall minor changes have been made to the Qualification Description and Packaging Rules in the Diploma.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC5XXXX Diploma of Arboriculture		
Industry Vic	At one stage Certificate 4 contained some important tree/plant health and biology units, Is it too late to address this? Dare I suggest the new unit "AHCARB569 Promote tree health" as core.	Developer is unaware of specific units in biology and couldn't find the unit recommended AHCARB569 by code or title on TGA. Each unit of competency contains the relevant biology and health knowledge embedded in the Knowledge Evidence component of the Assessment Requirements.
Industry NSW	Ref Entry requirements: I agree, there should be a minimum level of employment level to enable students to have had some hands on field work.	The entry requirements have not been changed as the SMEs advised the three level 3 units provide sufficient depth of arboriculture knowledge to succeed in this qualification.
	Ref AHCARB507 CAD unit I agree with this comment. Computer aided design software is a key part of a consultant arborists skills.	The SMEs advised that not all Arborists use CAD and that the unit <i>AHCARBXX507 Generate tree plans using computer-aided design software</i> should remain as an elective
Industry NSW	Agreed, entry level requirements have been insufficient. Work placement would be beneficial.	The entry requirements have not been changed as the SMEs advised the three level 3 units provide sufficient depth of arboriculture knowledge to succeed in this qualification.
	Ref AHCARB507 CAD unit: This is becoming an essential skill in preparing documents for submission to consent authorities. Perhaps this should be a core unit.	SMEs advised that not all Arborists use CAD and that the unit should remain as an elective.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC5XXXX Diploma of Arboriculture		
Gov Vic	If this is to be the entry requirement it is the same as the proposed skill set. Should the Entry Requirements then reference the Skill Set as well? Since some of these are very hands on, work based units, there would be little, if any opportunity for "entry level" candidates to complete these units and to gain any experience prior to undertaking the Diploma, other than completing them as core units in the Cert III via an Apprenticeship or by completing a self-funded (Vic) Skill Set with no explicit requirement for experience. The Diploma aligns approximately to a consulting arborist job role, so significant experience would be a factor to consider.	SMEs advised there was no need to reference the skill set title in the entry requirements. The entry requirements have not been changed as the SMEs advised the three level 3 units provide sufficient depth of arboriculture knowledge to succeed in this qualification.
RTO WA	Entry requirements are insufficient for Diploma level qualification. Suggest a minimum period of employment at a leading hand level would better prepare student for Diploma expectation and job outcomes.	The entry requirements have not been changed as the SMEs advised the three level 3 units provide sufficient depth of arboriculture knowledge to succeed in this qualification.
RTO Qld	Packaging rules No more than 10 UOCs should apply	The qualification requires 10 units of competency.

AHC6XXXX Advanced Diploma of Arboriculture

Little feedback was received on this qualification with one suggesting 2 fewer units. The size of the qualification has not changed. Based on SME advice the entry requirements have been revised to allow access for a broader range of people.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC6XXXX Advanced Diploma of Arboriculture		
Industry NSW	This is supported.	Thanks for your feedback, your support is noted.
	Ref AHCARB603 Interpret diag.. Is this necessary after requesting samples are assessed in a lab? Furthermore if an advanced test (such as picus) is requested, a written summary report is provided.	This unit has been retained based on SME advice. It addresses the interpretation and understanding of the test conducted so the individual can assess the validity and consistency of tests conducted.
RTO Qld	No more than 8 UOCs should apply	Based on the SMEs advice, the number of units required to achieve the qualification remains at 10.

AHC8XXXX Graduate Diploma of Arboriculture

Overall very few comments were received, with the entry requirements being the main concern. Based on SME advice the entry requirements have been revised to allow access for a broader range of people.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC8XXXX Graduate Diploma of Arboriculture		
Industry Nat	Additional degree majors: Horticulture Plant Science	The revised entry requirements for this qualification are - Prior to commencing the qualification, an individual must hold: <ul style="list-style-type: none"> • an advanced diploma of arboriculture or <ul style="list-style-type: none"> • an advanced diploma or higher qualification in a field related to arboriculture plus 5 years current work experience as senior consulting arborist or a municipal tree manager.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHC8XXXX Graduate Diploma of Arboriculture		
RTO Qld	No more than 8 UOCs should apply	The qualification requires 5 units of competency.
Gov WA	<p>Entry requirements</p> <p>It is noted that entry requirements have changed slightly for the AHC8XXXX Graduate Diploma of Arboriculture with the requirement of a learner to have a Diploma of Arboriculture combined with a degree with a major relevant to the industry. There is concern these entry requirements may restrict entry for learners from other relevant industry areas, therefore could they be broadened to include a degree in a specific area and industry experience, as another option for entry into the industry.</p>	Refer to the comment above regarding the revised entry requirements for this qualification.

Summary of feedback on units of competency

ARB - Arboriculture

The key issues with the units of competency include:

- Reference to Minimum Industry Standards (MIS) within the units of competency was generally well supported by industry and most RTO's. Some RTO's were concerned with the added cost to the organisation and student access to the standards. Others questioned the relevance. Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.
- Other changes were generally minor and modifications have been made where the SMEs supported the changes.

All comments for the units have been considered and addressed

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB206 Operate and maintain stump grinding machines		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB207 Perform ground based rigging		
RTO NSW	Really this should be deleted	The SMEs have advised that AHCARB207 Perform ground based rigging is to be retained for Certificate III in Arboriculture as a core.
RTO NSW	As previously noted this is a level 2 UoC that requires limited autonomy. It is Perform not Design ground based rigging. Estimating mass and dimensions is very dangerous (often underestimated) as opposed to calculating mass and dimensions. Careful consideration should be given to the removal of this KE, as calculating mass and dimensions is covered in the level 3 UoC Dismantle Trees.	SMEs advised to remove reference to estimating mass and dimensions from the Knowledge Evidence.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB207 Perform ground based rigging		
	Limited autonomy....PC 2.1 needs to be changed to 'contribute to tree assessment process' This is a level II UoC and as it currently stands they are expected to examine trees for defects?	Performance Criteria 2.1 has been changed to 'contribute to tree assessment'.
	After seeking the assistance of many ground and climbing arborists and searching the World Wide Web without success, can anyone clarify what a half hitch pre knot and Marline pre knot are, including their applications?	The SMEs discussed the range of knots and decided to leave the list as presented in both the Level 2 and Level 3 units of competency.
	As previously noted this is a level 2 UoC that requires limited autonomy. Tree examination for tree defects as a PC and subsequent PE and KE needs to be deleted.	See above.
	Same as PC 2.1....The words 'by assessing trees for defects' needs to be deleted because this is a level II UoC and as it currently stands they are expected to examine trees for defects?	See above.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB208 Recognise trees		
RTO NSW	General comment I am so pleased that this has been changed from 'botanical names where possible'. So many students go on to do the Cert 3, so they might as well learn the botanical names from the very beginning.	Thanks for your feedback, your support is noted.
	Must stay – reference to 35 different trees	Thanks for your feedback, your support is noted.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB208 Recognise trees		
Gov WA	Performance evidence I wonder if the PE is somewhat high for a Cert II qualification. Cert II is entry level, an assistant, under strong direction, often a school student. Why would they need to be able to do all this? Sounds more like AQF3 level work.	The SMEs felt that the level of this unit is acceptable at this level and that there is still a need to recognise trees.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB209 Assist with aerial rescue from the ground		
RTO NSW	Recognition of live electrical wires or apparatus AND electrical wires and apparatus safety. Are these not the same KE?	Base on the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB210 Work effectively in the arboriculture industry		
Gov WA	PC1.3 Sounds a little on the heavy side. Interpreting Awards for example is quite complex and often undertaken by lawyers, Perhaps 'understand key elements of employment conditions and role of Awards'. Need to include other aspects of workplace laws /regulation, eg EEO and harassment.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
	PC 2.1 (pedantic) affect people working in the arboriculture industry.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
	PE dot point general mechanical equipment: I guess this includes chainsaws, but I think chainsaws should be identified specifically.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
	perhaps: the importance of managing finances and wages (Cert II arboriculture workers don't get a salary).	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
	KE dot point 1. and all sub points This is far to detailed for an AQF level II worker. Simplify.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB210 Work effectively in the arboriculture industry	
KE Strategies for planning work Again too detailed and strategies is over the top for a cert II.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
You can't say this. Arboriculture Australia Ltd can recommend what they like, but these standards are not compulsory. Their standards even state that you don't have to follow their standards. You could include knowledge that there are industry standards in the knowledge evidence.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
PC1,1, 1.2, and 1.3 Combine into one element.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
This word seems a little clumsy. Are you trying to say something about understanding level of responsibility, decision making and reporting lines.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
again, clumsy. Just delete these words.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
'Understand' or 'analyse'. Interpret implies too much discretion at Cert II level. 3.2 could be combined with 3.1?	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
Dot point KE underground tree work telecommunications and optical ...	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
Reference to professional associations in KE Not sure this is appropriate here	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.
Reference to keeping abreast of new development in KE Not at cert II level. OTT.	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB210 Work effectively in the arboriculture industry		
RTO NSW	<p>As previously stated the Elements, PC's, PE's and KE's of the AHCARB210 Work effectively in the arboriculture industry UoC are for the most part simply a replication of the Elements, PC's, PE's and KE's from other units within this qualification. Meaning where a student meets an Element, PC, PE and/or a KE from an alternative UoC already listed, it simply maps across, likewise if a student fails to meet an Element, PC, PE and/or a KE from an alternative UoC. This unit represents a checklist only and should be deleted from the Certificate II qualification. It has no real learning value that is not represented in other UoC's.</p> <p>It is also very ambiguous... In the application it reads 'Undertake defined routine activities under supervision', yet element 5: Recognise, manage and mitigate? PC 5.1, 5.2 and 5.3 are inappropriate for a level 2 UoC, whereby as previously mentioned, they are required to undertake defined routine activities under supervision not Manage and Mitigate?</p> <p>This unit should be deleted.</p>	Based on feedback and the SMEs advice, the unit is now proposed for deletion as it is no longer required by the industry.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB2XX Apply treatments to trees (old ARB201)		
RTO NSW	Chemical sprayers and applicators... consider adding 'where appropriate'	This is a Knowledge Evidence component and as such all students should be aware of the use of all types of applicators. The wording where appropriate is unnecessary. No action required
	Tree injection systems...this KE should be removed from this Cert II UoC, or consider adding 'where appropriate'	See above comment.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB301 Implement a tree maintenance program		
RTO NSW	Yep, minimum 3 months, 3 trees. A realist time frame	Thanks for your feedback, your support is noted.
	I agree with both 410 and 459 Comment for Assessment Conditions Removal of spraying from unit.	Replaced reference to spray equipment to more generic reference to treatment equipment.
RTO SA	PE addition: Inclusion of Young tree maintenance programs as an option	SMEs advised that there is no need to specify age of tree.
	Agree with 459. Undertake a site specific risk assessment should suffice. This covers and allows the organisations document to be named differently as they appear to be so.	SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	Not all trees will require reduction pruning. Consider adding in trees requiring tree treatments and appropriate pruning.	The main types of possible tree maintenance should all be assessed as part of this unit of competency.
RTO Qld	Remove requirement for code and title of MIS just refer to industry standards	Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry. Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.
	Under assessment conditions: This unit needs to define between treatments to trees such as pruning or use of chemicals which would require a pre req of an ACDC licence suggest remove references to spraying ?	Chemicals can be applied without licencing if under supervision particularly when under training. However AHCCHM306 Prepare and apply chemicals for hand held application equipment and AHCCHM304 Transport and store chemicals are included as electives where the application of chemicals will require licencing. Reference to 'spraying' has been removed from the Assessment Conditions.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHCARB301 Implement a tree maintenance program		
	Should this just refer to SDS (Safety data sheet)	This dot point refers to all treatments including non-chemical treatments. SDS are covered under the preceding dot point. Chemicals and materials safety data.
	If using and spraying chemicals this unit will require ACDC Suggest leave chemical treatment to be covered in chemical units	Chemicals can be applied without licencing if under supervision particularly when under training. However AHCCHM306 Prepare and apply chemicals for hand held application equipment and AHCCHM304 Transport and store chemicals are included as electives where the application of chemicals will require licencing.
RTO NSW	I agree with 410. As previously noted, chemical treatments to trees are an option, but often a last resort, and as such are not always used. Delete sprayers or perhaps add 'where required'? Likewise 'chemical spill kit'	Chemicals can be applied without licencing if under supervision particularly when under training. However AHCCHM306 Prepare and apply chemicals for hand held application equipment and AHCCHM304 Transport and store chemicals are included as electives where the application of chemicals will require licencing. Reference to 'spraying' has been removed from the Assessment Conditions.
	PC 1.1 JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)	The SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	A program consisting of 3 trees with various maintenance requirements over a 3 month period is an excellent inclusion.	Thanks for your feedback, your support is noted.
	Chemical treatments to trees are an option, but often a last resort, and as such are not always used. Perhaps add 'where required'?	Chemicals can be applied without licencing if under supervision particularly when under training. However AHCCHM303 Prepare and apply chemicals and AHCCHM304 Transport and store chemicals are included as electives where the application of chemicals will require licencing.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB301 Implement a tree maintenance program		
	As previously noted, chemical treatments to trees are an option, but often a last resort, and as such are not always used. Delete 'signage – chemical use' or perhaps add 'where required'?	Chemicals can be applied without licencing if under supervision particularly when under training. However AHCCHM303 Prepare and apply chemicals and AHCCHM304 Transport and store chemicals are included as electives where the application of chemicals will require licencing.
	PC 3.4 Again add HAC	See above re JSA.
	Again add HAC	See above re JSA.
SMEs Feedback	Minor changes recommended to PC1.2, 1.5, 2.4, 3.5, PE and KE	Changes made to Performance Criteria, Performance Evidence and Knowledge Evidence.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB302 Inspect trees for access and work drafts available		
RTO NSW	2.3 or root crown and visible roots or roots where possible	Change made to Performance Criteria 2.3 added 'root crown and visible roots'.
	Ref: KEexperienced arborist Yes. 459 has a good point. This needs clarification	Changed Knowledge Evidence dot point to 'consulting arborist'.
RTO SA	PC 2.3 Simplify - Conduct a hazard evaluation of a tree.	Made change to PC 2.3 Conduct a hazard evaluation of the tree and surrounds.
RTO Qld	Remove MIS reference just include reference to industry standards	Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry. Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHCARB302 Inspect trees for access and work drafts available		
	Application statement: Should there be a requirement to report on trees to specify methods of access and work for example Use of an EWP Climb or crane access?	Modified Application statement included phrase 'and advise client of outcome'.
	Would this be a tree closer to overhead services than the minimum safe approach distances as defined by the relevant utility company?	This is an assessment condition to be decided by the Assessor. The individual being assessed would need to demonstrate their competency in their decision to approach overhead services.
	4.2 Explain what is required by this as this statement is unclear as to stakeholders and requirements	See feedback and reply below related comment.
RTO NSW	PC 4.2 I disagree with 410. In accordance with WHS legislation, stage 1 is essentially the process of inspecting trees for access and work. In doing so a thorough record outlining the safest possible method of tree access will be produced, and this needs to be reported to all stakeholders (clients, staff members, 3rd parties-eg; contractors, sub-contractors etc) and once completed, informed decisions will be made and this often leads to tree work being altered (eg; EWP required) and/or rescheduled (eg; specialist equipment and/or more experienced staff/contractors/sub-contractors) being required.	The SMEs recommended no change to Performance Criteria 4.2.
	PC 3.4 Experienced or qualified...if qualified to what level?	Wording has been changed for Performance Criteria 3.4 to 'consulting arborist'.
	PC 2.3 Inspecting tree roots is not always possible? Inspecting the 'root crown' perhaps, or consider adding where appropriate?	Wording changed of Performance Criteria 2.3 to 'to root crown and exposed roots'.
	PC 1.3 - JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).	SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	PC 1.4 - remove the word 'Conductors' and add Services (services is all encompassing, including conductors).	Change made to Performance Criteria 1.4 to 'services'.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB302 Inspect trees for access and work drafts available	
PC As previously noted, a JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).	SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
Performance evidence: As previously noted, a JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).	SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
As with PC 1.4 - this reference ignores telecommunications, gas lines etc. Replace with 'services' because the term services is all encompassing and is not limited to electrical apparatus only.	Change made to Performance Criteria 1.4 to 'services'
PC 3.4 An ambiguous PC? What if all risks have been sufficiently mitigated...But more importantly what is the standard for 'Sufficiently Controlled'....is that eliminated? (which is most often not possible?) Similarly, there are many operators in this industry who claim to be arborists....do you mean qualified or experienced? If qualified, to what level? Perhaps consider removing PC 3.4 altogether?	Deleted Performance Criteria 3.4.
This implies that anyone undertaking this UoC is currently working in industry 'in a tree crew'? Likewise, that they are capable of performing a needs analysis to determine individual skill levels? Consider deleting this KE	Knowledge Evidence requires demonstration of the variables and complexities of the trade. While not all people will necessarily work in a team or a work crew they need know the implications.
As previously noted, a JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)	SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB303 Perform pruning operations		
RTO WA	<p>PE crown modifications Crown reduction generally requires EWP or Climber. Pollarding of trees is not common practice in Australia and where would these trees be sourced? Prune trees for line clearance, students need to hold electrical units limits of approach Qual's to do such a job task. Such trees would be assets of Local Government, I'm sure they would love to have students prune their trees under power lines. Remove these requirements and you then have your remaining PE to be carried out.</p>	<p>Thus matter was discussed this with the electrical stakeholder in Victoria who recognise the role that commercial arborists clear trees from services on residential properties. They are happy with this outcome provided the units covers safety issues with electricity, which it does.</p>
Industry Vic	<p>PE Crown modifications Agree with 460, This requirement to prune a tree for line clearance isn't appropriate or practical.</p>	<p>See preceding comment. The Performance Evidence has been written to clarify this requirement.</p>
	<p>Ref MIS Agree With 410 on both counts</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry. Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
RTO NSW	<p>PC5.3 Ref to arborist Level of qualification needs to be clarified</p>	<p>Replaced wording in Performance Criteria 5.3 to 'consulting arborist'.</p>
	<p>PC5.5 This really doesn't make sense. If this can't be clearer it should be dropped</p>	<p>Removed Performance Criteria 5.5.</p>
	<p>PE and KE Pollarding is not only a specialised pruning technique, not commonly practised, but really it should be discouraged and viewed as inappropriate to our climate. Delete</p>	<p>SMEs advised that pollarding has been retained as it is still practiced in industry and is listed in Australian Standards AS 4373 Pruning of amenity trees under tree modifications.</p>
	<p>Formative pruning on you tree . . . Very important. Love it</p>	<p>Thanks for your feedback, your support is noted.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB303 Perform pruning operations	
	<p>Ref: PE Pollarding and line clearance: I agree with everyone on this point.</p> <p>Not practical on any level</p> <p>Recommended to delete these options.</p> <p>Stakeholder electrical safety Victoria suggested that private contractors do have a role to play on line clearance on private land.</p> <p>Pollarding has been retained as it is still practiced in industry and is listed in in the Australian Standards AS 4373 Pruning of amenity trees under tree modifications.</p>
RTO Qld	<p>Assessment Cond: What sort of tree pruning relationships would need to be reported? Affairs of the client and work team?? I can see some problems here! Suggest delete the statement.</p> <p>Deleted reference to reporting in the Assessment Conditions.</p> <p>PC 5.5 How far into the future? What outcome does this statement require? Please clarify.</p> <p>Performance Criteria 5.5 removed.</p> <p>Remove MIS just state refer to industry standards.</p> <p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry. Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p> <p>PC 5.4 Advice from who?</p> <p>Changed Performance Criteria 5.4 to 'consulting arborist'.</p> <p>KE re gauging the quality of pruning. This will have to be carried out over several months or growing seasons so suggest remove reference.</p> <p>This is a Knowledge Evidence component and as such Arborists need to know how to gauge the quality of pruning and be assessed on their understanding. How an RTO delivers and assesses this is not specified in a Training Packages.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHCARB303 Perform pruning operations		
	<p>Ref: PE Define requirements for pruning and crown maintenance as crown maintenance is a specific pruning operation in its own right as is formative pruning for example.</p>	<p>The terms Crown maintenance and crown modifications is specified in AS4373 Pruning of amenity trees as a classification of pruning types. RTO's should be working with the AS4373 Pruning of amenity trees in order to ensure their training and assessment meet recognised industry terminology and practices.</p>
	<p>Ref: Application Unit needs to state requirements clearly as there is a big difference between ground based and aerial pruning work.</p>	<p>AS4373 Pruning of amenity trees does not distinguish between aerial pruning and ground based pruning. The standard specifies the proper pruning techniques from the tree performance not how to access the tree.</p>
	<p>Is this a typing error? Not sure what extant means.</p>	<p>Definition of extant – still in existence or surviving.</p>
	<p>Some of these operations would not be possible unless working at height so would be unable to assess a ground based operator it would also require more than one tree to demonstrate competency in the required disciplines.</p>	<p>The Performance Evidence has been rewritten to accommodate non-climbing and Elevated Work Platform operators of less than 11 metres.</p>
	<p>PE dot point perform pruning cuts: Reference to the use of hand saws and secateurs required this unit should specify required pruning equipment that is required to be used.</p>	<p>Pruning cuts should be made with tools that the assessor deems appropriate for the tree and assessment environment.</p>
	<p>Assessment Conditions: Secateurs should be part of the pruning tools list required are pole saws to be powered or manually driven?</p>	<p>Added secateurs to the list in the Assessment Conditions.</p>
RTO NSW	<p>Ref: Pre-requisites I agree 123. The requirement of the multitude of pre-requisite units in Certificate III Arboriculture was a major barrier to successful completion. Well done on the removal of this (and many other) ridiculous pre-requisite units.</p>	<p>Thanks for your feedback, your support is noted.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB303 Perform pruning operations	
<p>I agree with 410 regarding 'relationships'?</p> <p>This is totally ambiguous and should be deleted.</p>	<p>The dot point “relationships” in the Assessment Conditions highlights the need for a client and a work team for this unit to be assessed. It does not relate to the preceding dot point as stakeholder 410 has inferred in the feedback.</p>
<p>Demonstrated knowledge of Rescue Procedures is not required as the unit application clearly states ‘pruning to trees either from the ground or whilst working at heights’. Delete this criterion or perhaps add ‘where appropriate/required’?</p>	<p>Knowledge does not need to be demonstrated (psychomotor skill) but assessed that the individual understands the procedures and processes on the worksite (cognitive skill) where pruning is occurring. See primary dot point.</p> <ul style="list-style-type: none"> • procedures and process of job safety analysis (JSA) for pruning work site and activities and control measures.
<p>MIS are documents being produced which are designed to be a MINIMUM standard of Arboricultural practices, not THE standard. Meaning 'in addition to'. It is not a replacement of current standards, it is designed to ensure a MINIMUM level of NATIONAL education. As such, I disagree with 232 and 410.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
<p>PC 2.6. As previously noted in PC1.4 - JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)</p>	<p>SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.</p>
<p>PC 5.3 and PC 5.4 I agree with 410....advice from whom...experienced or qualified...if qualified to what level?</p>	<p>Performance Criteria 5.3 and 5.4 edited and updated to</p> <p>5.3 Seek advice from consulting arborists on quality of current pruning work practice</p> <p>5.4 Identify substandard current pruning cuts and rectify according to advice</p>
<p>PE: Formatively pruned a young tree...Excellent inclusion :)</p>	<p>Thanks for your feedback, your support is noted.</p>
<p>PE regarding operate</p>	<p>This should be at the discretion of the assessor and the specifications given to the operator.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHCARB303 Perform pruning operations		
	Perhaps add 'operated appropriate pruning tools, including chainsaws and pole saws'?	The pruning operation is being assessed.
	Ref to JSA in PE: Again, as previously noted in PC1.4 and PC 2.6 - JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)	SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	Ref to KE: Gauging the quality of pruning... I disagree with 410. Knowledge on the quality of pruning can be gauged and evaluated by assessing trees that have been pruned in previous seasons. eg, an audit.	Positive comment to retain Knowledge Evidence dot point. Thanks for your feedback, your support is noted.
	Ref to KE Whistle signals I can't see whistle signals specifically mentioned anywhere else in this UoC. Very few companies actually use whistle signals. This should be an option not a requirement, or deleted altogether.	Knowledge Evidence is a cognitive component; students must have an understanding that whistle signals are a type of communication that is used on some sites.
	PC 1.4 - JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)	SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	PC 5.5 I agree with 410....Ambiguous at best? Modify something not yet undertaken? Advice from whom...experienced or qualified...if qualified to what level?	Performance Criteria 5.5 has been removed from Unit.
	Ref: to PE Crown modifications: I, in part, agree with 460. Crown reduction often includes lateral branches, this can be done, via EWP, Climbing or from the ground with a power pruner/pole saw...A great inclusion. Pollarded a tree...not practiced widely in this country due to tree species and climate. Delete this PE.	Advice from stakeholder power company Victoria suggested that arborists do have a role to play on line clearance of residential low voltage wires on private land. This does not refer to high voltage wires in the street. Pollarding has been retained as it is still practiced in industry and is listed in in the Australian Standards AS 4373 Pruning of amenity trees under tree modifications. (AS4373 clause 7.3.4)

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB303 Perform pruning operations		
	Pruned trees for line clearance... Cannot be performed without extensive (and expensive) electrical training and authorisation from energy supplier. Delete this PE.	
	As previously noted in PC1.4 and PC 2.6 - JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).	SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARBXX (old 305) Dismantle trees		
RTO NSW	PE and KE Knots list: this list is over the top yes I understand knots are important BUT we only use about 8 main knots we don't need Zeppelin bend, twin bowline bend, if you want your crew to know the knots you teach them	The SMEs revised the knots list and decided to leave the list unchanged. Individual arborists use different knots and advised that by providing a broad range of knots the individuals have a choice for their specific application.
RTO WA	PE and KE Knots list: Any reason why we are using Zeppelin Bend knot in Arboriculture?	The SMEs revised the knots list and decided to leave the list unchanged. Individual arborists use different knots and advised that by providing a broad range of knots the individuals have a choice for their specific application.
	PE and number of trees to dismantle: Depending on number of students, i.e. 15 students requires 30 trees to be removed. Where would all these trees be located or sourced. Should we assess in a different way and preserve our urban forest canopy	Performance Evidence has been updated with more specific requirements. The SMEs advised 2 trees would provide a more complete assessment of an individual's competency.
	Ref: Foundation skills need for correct spelling. Very Grey area, a margin of error needs to be allowed.	Comments noted. This is a standard to achieve. If spelling is not a priority for this industry then it should be removed from

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARBXX (old 305) Dismantle trees		
		the foundation skills table. This matter will be raised with industry SMEs when the Performance Criteria of the units are settled.
Industry WA	Ref PE Zeppelin bend If you have to join two ropes together, have you selected the appropriate equipment for the task? I haven't used this knot previously but not totally opposed to the inclusion.	SMEs revised the knots list and decided to leave the list unchanged. Individual arborists use different knots and advised that by providing a broad range of knots the individuals have a choice for their specific application.
	It can be very difficult to find trees that can provide the full spectrum for all students. Makes it hard for the assessor.	Comments noted.
	Ref MIS in Assessment conditions 410 makes good points	Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry. Based in SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.
	Ref PC1.5 The load would usually be in the drop zone unless I am missing something.	In Performance Criteria 1.5 Load in this context is the removed material to be lowered or dropped into the drop zone. No action required.
	PC 2.7 Is documentation/auditing required?	Performance Criteria 2.7 is about basic pre-use checks not a full audit and so does not require documentation. Unit AHCARB404 Conduct a safety audit is available for those wishing to conduct a full audit.
	Ref Application How extensive could it possibly be during the first year of the student entering the industry? Usually new workers are dragging branches and performing less technical tasks for a year or more.	The stakeholder assumes this is for a student when it relates to a job outcome. Extensive knowledge is required to perform this task as a qualified worker not as a student.
	Ref: PC2.4 Design rigging...	To address Performance Criteria 2.4 Design rigging system to allow for load, impact of force and structural integrity of tree

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARBXX (old 305) Dismantle trees	
<p>How will evidenced be obtained to assess the student? How will the assessor verify the estimations?</p>	<p>See Performance Evidence dot point:</p> <ul style="list-style-type: none"> • selected, prepared, checked and used tools and equipment for rigging and dismantling work, including sub points: <ul style="list-style-type: none"> • estimated mass of load and ensured force applied during rigging operations did not exceed working load limit of equipment • adjusted rigging systems as required to limit force applied to rigging system and tree structure <p>And Knowledge Evidence dot point 11 referring to demonstrating the skills and calculating mass.</p> <ul style="list-style-type: none"> • calculating and estimating tree dimensions and forces in rigging, including: <ul style="list-style-type: none"> • density of tree sections • methods of estimating mass of tree sections • estimation of force magnitude and direction applied during rigging operations • tree structural limitations and defects and impact on rigging and dismantling operations • ensuring force applied does not exceed working load limit of equipment components • mass dampening effect of rigging systems.
<p>Designing the system to accommodate forces is required. Where is there any training to calculate force or vectors?</p>	<p>Please refer to the Assessment Requirements</p> <p>See Performance Evidence dot points:</p> <ul style="list-style-type: none"> • selected, prepared, checked and used tools and equipment for rigging and dismantling work, including sub points: <ul style="list-style-type: none"> • estimated mass of load and ensured force applied during rigging operations did not exceed working load limit of equipment • adjusted rigging systems as required to limit force applied to rigging system and tree structure <p>and Knowledge Evidence dot point 11 referring to demonstrating the skills and calculating mass.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARBXX (old 305) Dismantle trees	
	<ul style="list-style-type: none"> • calculating and estimating tree dimensions and forces in rigging, including: <ul style="list-style-type: none"> • density of tree sections • methods of estimating mass of tree sections • estimation of force magnitude and direction applied during rigging operations • tree structural limitations and defects and impact on rigging and dismantling operations • ensuring force applied does not exceed working load limit of equipment components • mass dampening effect of rigging systems
<p>PC 3.3 Add in "with consideration of mass damping".</p>	<p>Included reference to 'mass dampening effect of rigging systems' in the knowledge evidence.</p>
<p>PC3.9 Fell the trunk of dismantled tree... May be inappropriate for crane dismantling.</p>	<p>SME advised to retain the performance 'Criteria 3.9 Fell the trunk of dismantled tree safely into drop zone according to industry standards' as this is a necessary part of dismantling the tree.</p>
<p>KE Calculating and estimating: Include vectors</p>	<p>The definition of Vector - a quantity having direction as well as magnitude, especially as determining the position of one point in space relative to another. This is inferred in the statement 'force, magnitude and direction' in the Knowledge Evidence.</p>
<p>Ref: MIS Disagree with 410 regarding the MIS and the definition and requirement of "broad" supervision.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARBXX (old 305) Dismantle trees		
	Bowline with Yosemite tie off also please	SMEs revised the knots list and decided to leave the list unchanged. Individual arborists use different knots and advised that by providing a broad range of knots the individuals have a choice for their specific application.
	Ref MIS Why do you want it removed?	Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry. Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.
	Ref PC1.9 This PC can be extremely involved depending upon the equipment used.	Comments noted.
	Check element numbers for matching PC numbers	Corrected numbering for Elements and Performance Criteria.
	Ironic that a knowledge of physiology is required to cut the tree down? We don't want it photosynthesizing or transpiring all over us!	The physiological differences may impact the selection and method of dismantling. E.g. the difference between Palm trees and Pine trees.
RTO SA	Ref: PE and number of trees Agree with 460. If large tree sizes are available as opposed to large tree numbers on some sites to accommodate assessment. Agree with 410 & 459 with minimum sizes stated.	The SMEs advised 2 trees would provide a more complete assessment of an individual's competency. Performance Evidence has been updated with more specific requirements
Gov WA	It is not the place a training packages to specify 'industry standards' unless they are legislation or regulation. It would be perfectly acceptable to say: 'current industry standards', without specifying which industry standard.	Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARBXX (old 305) Dismantle trees		
		<p>will assist to increase the skills and knowledge required by the industry.</p> <p>Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
RTO Qld	<p>PE Zeppelin bend It's a good knot to join two ropes it has a place but maybe not in this unit.</p>	<p>The SMEs revised the knots list and decided to leave the list unchanged. Individual arborists use different knots and advised that by providing a broad range of knots the individuals have a choice for their specific application.</p>
	<p>Application Define a confined space or remove the reference.</p>	<p>Reworded 'confined space' to 'close proximity to structures and other assets' in the Application.</p>
	<p>Specify required cuts such as step cuts scarf cuts etc.</p>	<p>These are specified in the Performance Evidence and Knowledge Evidence. The Unit of competency is a statement of Job outcome and don't need to list all the specific requirements. No action required</p>
	<p>Remove MIS reference.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHCARBXX (old 305) Dismantle trees		
	<p>MIS is mentioned several times throughout this document it would seem that this unit has been based upon it and so seems to be very important so why should this MIS not be incorporated into the assessment instead of being a document that has to be purchased separately??</p> <p>We also don't have a code of practice in Australia for tree dismantling so how can this be complied with?</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
	<p>Ref: Application</p> <p>Should this be removed as these individuals are supposed to be trade qualified and able to supervise themselves?</p>	<p>Application statement has been reworded from 'under broad supervision' to 'under broad direction'.</p>
	<p>Ref: PE: Height and diameter of trees to dismantle</p> <p>Should specify a minimum height and diameter for the tree removals and for the height of remaining tree to be felled otherwise students could be assessed on any size tree and the old tick and flick system will be able to be used by any unscrupulous assessor</p>	<p>Performance Evidence has been updated with more specific requirements.</p>
RTO SA	<p>Ref: PE – dot point installed rigging equipment.</p> <p>"Installed rigging equipment to industry standards and manufacturer recommendations"</p>	<p>Performance Evidence has been updated with more specific requirements.</p>
	<p>Comment made by another for Application statement 489</p> <p>What is there to say that this has to be done in their first year?</p> <p>Providing RTO's are spending the right amount of time with students in the form of contact days then it shouldn't be an issue.</p> <p>Again people are assuming that students aren't working part time in the industry.</p>	<p>Comments noted.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARBXX (old 305) Dismantle trees		
	<p>Ref: Title Maybe extend title to "dismantle trees using rigging techniques" since a lot of the performance criteria references rigging and industry expects that students will be able to remove trees using rigging more than just dropping bombs.</p>	The SMEs advised to retain title as Dismantle trees.
	<p>The MIS are an incredibly good and useful training tool and as an industry recognised "standard" should be referenced.</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
	<p>Ref PE cut and hold Cut and hold needs to be expanded on to specify they don't mean with a chainsaw as it is not a safe technique with a chainsaw.</p>	Performance Evidence has been updated with more specific requirements.
RTO NSW	<p>As previously noted, a JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).</p>	SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	<p>As previously noted, a JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).</p> <p>I also agree with 460 that a margin of error is required...e.g. spelling?</p>	SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARBXX (old 305) Dismantle trees	
<p>I disagree with 460 and agree in part, with 410. A Zeppelin bend is widely used for tying two ropes together (usually a pull/tag line). It avoids using the traditional double fisherman, which becomes extremely difficult to untie once loaded, likewise a bowline which can untie if not continually loaded. I would also like to see the Hunters Bend included in this list (for the same stated reason)</p>	<p>SMEs revised the knots list and decided to leave the list unchanged. Individual arborists use different knots and it was felt that by providing a broad range of knots the individuals have a choice for their specific application.</p>
<p>'Confined Space' is clarified in the Assessment Conditions section</p>	<p>Reworded Application 'confined space' has been reworded to 'close proximity to structures and other assets' in the Application.</p>
<p>Re Prerequisites The requirement of the multitude of pre-requisite units in Certificate III Arboriculture was a major barrier to successful completion. Well done on the removal of this (and many other) ridiculous pre-requisite units.</p>	<p>Thanks for your feedback, your support is noted.</p>
<p>PC 2.3 Estimating the force applied to static loading is quite simplistic....dynamic is too variable. Consider deleting the 'and dynamic' reference.</p>	<p>Removed reference to both static and dynamic in the Performance Criteria 2.3 as this will be explained as part of the Knowledge Evidence and demonstrated in the Performance evidence.</p>
<p>PC 3.9 The felling of a 'TRUNK' whilst standing on the ground requires 'Advanced Felling' certification. As Certificate III incorporates FWPFGM3212 Fall Trees manually (intermediate) as a core UoC, PC 3.9 should be deleted.</p>	<p>As the Performance Criteria is a statement of job outcome which would normally be performed as part of dismantling a tree this Performance Criteria should remain. Duplication with other units is incidental.</p>
<p>PC 5.3 What learning outcome does this provide? Consider deleting PC 5.3</p>	<p>As the PC is a statement of job outcome (not a learning outcome) that would normally be performed as part of dismantling a tree this PC has been retained.</p>
<p>I agree with 410. Minimum dimensions should be specified, but not to discriminate against those who may have physical and/or emotional (height) limitations. eg Minimum Height 5m and Minimum DBH 200mm</p>	<p>Performance Evidence has been updated with more specific requirements.</p>
<p>2 structurally different trees in confined spaces is a great inclusion.</p>	<p>Performance Evidence has been updated with more specific requirements.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARBXX (old 305) Dismantle trees		
		The SMEs advised 2 trees would provide a more complete assessment of individual's competency.
	PC 1.3 - JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)	SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB306 Undertake aerial rescue		
Industry Vic	AHCARB307 is in the current (old) package	Code has been corrected for the prerequisite unit AHCARB3XX Use arborist climbing techniques.
	Why are we pushing Stakeholder's resources as minimum industry standards? Especially now Arb Australia are selling them?	Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry. Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.
RTO NSW	These are prerequisites that actually make sense	Thanks for your feedback, your support is noted.
RTO SA	PC2.3 - and add, determine nature of injury and reassure casualty	The tree hasn't been accessed yet so would be difficult to determine nature of injury. Element 4 addresses this after ascending the tree.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB306 Undertake aerial rescue		
RTO Qld	<p>If this MIS is mandatory to follow its requirements should be listed here and not have to be sourced from elsewhere and used as a separate document in conjunction with this unit</p> <p>Should just state refer to industry standards</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
	<p>Ref: to KE emergency protocol STOP_AID_AIR_TRANSFER Are these all Australian approved acronyms if so full descriptions should be published here</p>	<p>Full description has been included in the Knowledge Evidence for STOP_AID_AIR_TRANSFER stop work, activate rescue plan, inspect site for tree hazards, delegate crew roles, access tree, install anchor points, reach casualty, lower casualty, transfer to emergency services.</p>
RTO SA	<p>There needs to be a reference in here somewhere regarding continual refresher training i.e. how often it needs to be done and what needs to be done as part of the refresher.</p>	<p>Refresher training is not a required addition to the units of competency.</p> <p>However if industry support this it can be included in the Implementation Guide.</p>
RTO NSW	<p>Ref: to KE emergency protocol STOP_AID_AIR_TRANSFER I agree with 410. Do these acronyms align to current Australian 1st Aid procedures? If so please publish a full description/explanation.</p>	<p>Full description has been included in the Knowledge Evidence STOP_AID_AIR_TRANSFER stop work, activate rescue plan, inspect site for tree hazards, delegate crew roles, access tree, install anchor points, reach casualty, lower casualty, transfer to emergency services.</p>
	<p>Good to see the reduction of the excessive six pre-requisite UoC's to two...Excellent work</p>	<p>Thanks for your feedback, your support is noted.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB309 Implement a tree protection program drafts available		
RTO Qld	<p>This unit should be addressed by using the Australian standard AS4970 Protection of trees on development sites surely this is a more relevant document that should be referenced instead of particularly requiring exclusive use of MIS documentation?</p> <p>MIS are mentioned several times in this document while endorsed Australian standards are not even mentioned once?</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB313 Identify trees		
Gov WA	Should there a criteria around assessment of risks to people and property posed by trees (healthy and unhealthy)?	Tree risk assessment is covered in AHCARBXX5XX Examine and assess trees. Risk to people and property from trees should be addressed in 'benefits and values of trees' in the Knowledge Evidence component of this unit. No action required.
RTO NSW	Ref: number of trees PE I support 100 trees. Botanical names and common names. I still would like the inclusion of major Families in the identification.	SMEs advised to identify 80 trees. Family characteristics have been included in the Knowledge Evidence.
	The sensory aspect of plants can be a major component of identification.	Comments noted.
	Ref: PE I agree that that 'work environment' should be deleted. We are trying to bring more people into the industry, not only cater for people that are already in the industry.	SMEs advised that the trees should be identified for the work environment not an unrelated list. If individuals are new to the sector then training should provide for local conditions and tree species selected by the training organisation.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB313 Identify trees		
	<p>In the KE it clearly states that identification is to the level of genus and species, but learners must recognise taxonomic characteristics of Families common to an area.</p> <p>This should be reflected in the PC.</p> <p>3.3 Could read . . . identify to genus and species, plus FAMILY if appropriate</p>	<p>Reworded Performance Criteria 3.3 to better to reflect naming from plant family to lowest level of classification.</p> <p>3.3 Analyse plant specimens for specific characteristics and identify from plant family to lowest botanical classification</p>
	<p>Maybe the word 'value', which implies or could be misinterpreted as a financial value, should be changed to benefit.</p>	<p>Value has been retained the Knowledge Evidence with the distinction being:</p> <ul style="list-style-type: none"> • benefits and value of trees including, including:: <ul style="list-style-type: none"> • cultural/social • economic • conservation/environmental • aesthetic.
	<p>I absolutely agree. Plant identification must always be a core unit of any Arb or Hort course.</p>	<p>Thanks for your feedback, your support is noted.</p>
	<p>If learners can recognise the taxonomic features of major Families, then they can include the Family name in the identification.</p>	<p>Reworded Performance Criteria 3.3 to better to reflect naming from plant family to lowest level of classification.</p> <p>3.3 Analyse plant specimens for specific characteristics and identify from plant family to lowest botanical classification.</p>
RTO Qld	<p>Ref: PE number of trees for identification Suggest 100 trees</p>	<p>SMEs advised to identify 80 trees.</p>
RTO NSW	<p>Ref: PE Local to individuals work environment The term 'local to the individuals work environment' should be deleted. It presumes that a stakeholder/student is already working in industry. It also restricts the learning capacity of students to expand their knowledge of trees that they may very well work with in their future. eg, if they relocate to another state or territory.</p>	<p>Work environment can be either paid work or work performed at the learning facility. This statement supports recognition of plants in the region. For example, tropical species as against temperate species.</p> <p>If individuals are new to the sector then training providers should provide tree species for local conditions.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB313 Identify trees	
<p>Great to see this unit remains a core UoC. For far too long a comprehensive lack of industry consultation led to significant and often blinding omissions. This unit, until the current Training Package was an elective.....??? How could one ever consider themselves a trade level Arborist without knowing the difference between a Myrtaceae or Proteaceae?</p>	<p>Thanks for your feedback, your support is noted.</p>
<p>Ref: KE Rating systems for tree evaluation? Not convinced this is a suitable requirement for a level 3 UoC. Consider deleting this KE.</p>	<p>Removed reference to rating system from the Knowledge Evidence.</p>
<p>KE Again, not convinced 'tree evaluation/value' is a suitable requirement for a level 3 UoC. Consider deleting this KE.</p>	<p>Tree valuation is covered under AHCARBXX5XX Examine and assess trees. The value of trees in this unit is more generic and not to be confused with the level 5 unit AHCARBXX5XX Examine and assess trees, performed by a consulting arborist.</p>
<p>KE And again, not convinced 'tree value' is a suitable requirement for a level 3 UoC. Consider deleting this KE.</p>	<p>Tree valuation is covered under AHCARBXX5XX Examine and assess trees. The value of trees in this context is more subtle and should be dealt with at the appropriate AQF level of training and in the context of 'identifying trees'.</p>
<p>PE number of plants I agree with 410. A minimum of 80 - 100 trees to be CORRECTLY identified – Botanical AND Common names</p>	<p>SMEs advised to identify 80 trees. No need to include the word "correctly" since the plants won't be identified if they are incorrect. Performance Criteria 3.3 now includes naming from 'Family to lowest botanical classification' which would include vernacular name.</p>
<p>Tactile and sensory....A great inclusion as this stops unscrupulous RTO's from assessing (and passing) students via limited methods such as photographs/worksheets etc.</p>	<p>Thanks for your feedback, your support is noted.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB313 Identify trees		
	Live tree specimens...As previously noted, a great inclusion as this stops unscrupulous RTO's from assessing (and passing) students via limited methods such as photographs/worksheets etc.	Thanks for your feedback, your support is noted.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB3XX Access trees for inspection and ecology		
Gov Vic	<p>Assessment Conditions AHCARB307 Use advanced climbing techniques AHCARB312 Use standard climbing techniques to access trees Both units contain in the Assessment Conditions the statement 'It is an industry requirement for competency in this unit that assessment must include a log record of two hundred (200) hours of advanced /standard climbing. There is no guidance as to how this log book is to be completed. How is the RTO able to verify that it is a true and accurate record of the climbing undertaken? When does a person commence completing their log book? Once they have been deemed competent in the unit? It may take a long time for the person to complete the log book depending on their work requirements. The requirement of a log book sits outside the requirements of training. In the present form both these units are not implementable, suggest removing the 200hour log book industry requirement.</p>	On advice from the SMEs the previous requirement for log books has been removed from all units of competency.
RTO NSW	<p>Element 3 – Title and specification of height and transitions. I agree with 410 in part, that there could a statement about Including work such as ...</p> <p>But how can you possibly specify how high or distance between transition and anchor points?</p>	Respondent comments on another stakeholder's feedback - See RTO Qld 2 rows down ref: Application.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB3XX Access trees for inspection and ecology		
	Ref: Application comment on RTO Qld Once again, minimum hours are a good idea, as long as it is able to be achieved by students over the duration of the training and not as a prerequisite or to be undertaken outside of the training environment.	Comments noted.
RTO Qld	Ref: Application How tall a tree? What is the required outcome? Should there be a requirement for some minimum hours to be recorded say 50?	Application relates to the unit of competency and is a statement of job outcome and as such won't specify dimensions. Specific requirements should be included in the Assessment Requirements.
	Ref: Element 3 What work will be required to be carried out how high up transition between anchor points needs clarification.	Elements and performance criteria do not specify actual activities to be performed. (e.g. how high the transition or the distance from anchor points). This detail will be found in the Assessment Requirements that specify what is to be assessed.
	Ref: PE Should specify requirements for height. Changeover of anchor points branch walking distance from trunk. State activities required within tree is it just a visual inspection unit or will candidates require to be installing nest boxes or creating hollows in the tree. I can't see much use for this unit unless these points are included.	This unit was prepared as a basic climbing unit for non-arborists.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB3XX Install tree support systems (Old ARB308)		
RTO Qld	Title A tree support system could be deemed as quite complex. Are we asking for cable or similar bracing of individual branches or are we propping the tree or bolting limbs I think this unit needs to be more specific as to the required outcome?	The SMEs advised that tree support systems are inclusive of a range of techniques and may include all those mentioned in your feedback: 'cable or similar bracing of individual branches or are we propping the tree or bolting limbs'

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB3XX Install tree support systems (Old ARB308)	
	The individual will be working with a specification provided by an arborist for the installation not designing their own.
What evidence is required this is open to misinterpretation	<p>The installation of these systems must be assessed by an assessor. The individual will be working with a specification provided by an arborist for the installation not designing their own.</p> <p>All three types must be installed.</p> <ul style="list-style-type: none"> • steel cable • textile/synthetic cable • bracing. <p>The Performance Evidence has been revised to improve understanding of the specific outcomes to demonstrate.</p>
<p>Just refer to industry standards</p> <p>Remove MIS refer industry standards</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>
Pruned tree would not aid a support system although generally pruning is carried out when bracing branches for example consider removing or revising this section	The Performance Evidence has been revised to improve understanding of the specific outcomes to demonstrate.
Ref: Assessment Conditions Should a candidate be required to whip splice and swage steel cable as part of this assessment?	The knowledge evidence identifies the methods 'whip, splice and swage steel cable' and should be assessed from a cognitive perspective.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB3XX Use arborist climbing techniques		
Gov Vic	<p>Assessment Conditions AHCARB307 Use advanced climbing techniques AHCARB312 Use standard climbing techniques to access trees Both units contain in the Assessment Conditions the statement 'It is an industry requirement for competency in this unit that assessment must include a log record of two hundred (200) hours of advanced /standard climbing. There is no guidance as to how this log book is to be completed. How is the RTO able to verify that it is a true and accurate record of the climbing undertaken? When does a person commence completing their log book? Once they have been deemed competent in the unit? It may take a long time for the person to complete the log book depending on their work requirements. The requirement of a log book sits outside the requirements of training. In the present form both these units are not implementable, suggest removing the 200hour log book industry requirement.</p>	<p>On advice from the SMEs the previous requirement for log books has been removed from all units of competency.</p>
Industry Vic	<p>Ref: Mapping Table Surely "Basic tree climbing" should stay a stand alone unit, possibly as a certificate 2 level unit. If there are 3 separate units/levels to tree felling, we can at least have 2 climbing units.</p>	<p>The SME advised was that to be a climbing arborist there is no basic level skill to climbing, just the skill to climb trees safety to perform work.</p> <p>The basic unit has been transitioned into AHCARB3XX Access trees for inspection and ecology. Which is designed for non-arborists such as conservation and land managers and others who wish to access trees with minimum skills.</p>
	<p>Seems unwise to be referring to these minimum industry standards</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB3XX Use arborist climbing techniques	
	Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.
RTO Qld	<p>No hours for climbing unit. If there are no climbing hours even a minimum of 50 we will go back to the old days where climbers are able to receive a climbing ticket within 2-3 days. The climbing hours prevents RTO's with little or no industry experience delivering courses in this high risk industry. And in my opinion this is severely unsafe for our industry. Employers need to have confidence that individuals have received undertaken minimum climbing hours.</p>
RTO NSW	<p>Ref: Prerequisite and Log book I completely agree with 459 & 430 and I am in total disagreement with 410.</p> <p>There is no enrolment requirement for Arb cert 3 that states students must currently be working in the industry and must continue to do so for the entirety of the course. Therefor we simply cannot have a unit with a prerequisite or huge climbing hours that exclude the scope of all students that are allowed to enrol.</p> <p>This goes against the purpose of vocational education.</p> <p>I agree with 100 climbing hours to be undertaken during training as this measurable and achievable in the duration of unit delivery.</p>
	<p>Shouldn't any reference to spurs and gaffs and dismantling trees sit in the unit Dismantle Trees?</p> <p>After all we are not using these on trees or palms to be retained.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB3XX Use arborist climbing techniques		
RTO SA	Agree with the log book removal. These can be doctored easily.	The SMEs advised that a log book is not required as the Performance Evidence now specifies the nature, volume and frequency of tasks required to demonstrate competency.
RTO Qld	Refer to industry standards not MIS	Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry. Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.
	Ref: Mapping table There should be a basic climbing unit as well as an advanced unit also with 100 log book hours required prior to final assessment	SME advice was that to be a climbing arborist there is no basic level skills to climbing, just the skill to climb trees safety to perform work. This includes all climbing techniques required. The SMEs advised that no log book is required as the Performance Evidence now specifies the nature, volume and frequency of tasks required to demonstrate competency.
	A pre req of a climbing hours log book of 100 hours would ensure the student had some climbing experience in the workplace and reduce the opportunity for non qualified individuals to be signed off for climb and rescue in the space of a few days feedback from our industry contacts is positive for this to be a mandatory requirement	The SMEs advised that a log book is not required as the Performance Evidence now specifies the nature, volume and frequency of task required to demonstrate competency.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB3XX Use arborist climbing techniques		
RTO SA	<p>Ref: PE and KE moving rope techniques etc. MVT/DRT/DDRT moving rope technique double rope technique dynamic double rope technique</p> <p>SRT Static rope technique single rope technique</p>	<p>Advice will be sought from the SMEs on whether to clarify these acronyms in the units or adding these in the Implementation Guide as advice for training organisations and clarity of meaning.</p>
	<p>Ref: Knowledge Evidence dot point 8 Limits, advantages..... Should also include mechanical devices such as petzl zigzag, ISC ropewrench, ART spiderjacks, etc</p>	<p>The SMEs advised was to reframe from using specific products and product names and to use generic terms to allow for variation for locally used equipment.</p> <p>Knowledge Evidence refers to: 'climbing hardware including ascenders, descenders, mechanical friction devices, false crotches and artificial redirects'</p>
	<p>MIS provide a clearer reference for RTO to unpack the unit material and makes it more difficult tick and flick operations</p> <p>Also the MIS give students an easy to understand outline of what is expected of them not only from an RTO but a wider industry</p>	<p>Based on the majority of feedback and advice from SMEs the reference to the MIS has been retained in selected units of competency and their assessment requirements, as the MIS will assist to increase the skills and knowledge required by the industry.</p> <p>Based on SME advice, Australian (AS) will be referenced by code and title in the units of competency and their assessment requirements where the AS are appropriate.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB3XX Use arborist climbing techniques	
<p>RTO NSW I comprehensively disagree with 410 on two points.</p> <p>1. A pre-requisite of 100 logged climbing hours EXCLUDES EVERYONE NEW TO THIS INDUSTRY AND SIMPLY RESTRICTS COURSE ENTRY TO THOSE ALREADY CLIMBING!!! How can this possibly be considered inclusive?</p> <p>2. Stating 'our industry contacts'...there is only one posting regarding a pre-requisite of logged hours?</p>	<p>SMEs recommended that a log book is not required if the performance evidence requirements are met.</p>
<p>Great to see the removal of the absurd 400 hours log book requirement. In saying this I do agree with 430, though I think a minimum log of 100 hours is more appropriate. I believe 50 hours can still be manipulated too easily by unscrupulous RTO's - (eg signed off in few days), whereas 100 hours is substantial, yet both achievable and accessible to students.</p>	<p>The SMEs advised that a log book is not required as the Performance Evidence now specifies the nature, volume and frequency of tasks required to demonstrate competency.</p>
<p>As previously noted in PC 1.2 - A JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)</p>	<p>SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.</p>
<p>As previously noted in PC 1.2 - A JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)</p>	<p>SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.</p>
<p>Ref: Comment made a number of times for different components in this unit. Again, the unit application makes no mention of dismantling trees. The use of spikes/spurs/gaffs are mostly associated with tree removal. Add 'where required' or delete.</p>	<p>This unit is about all climbing techniques and doesn't specify which trees. Part of the learning process should highlight when it is applicable to use the different methods.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB3XX Use arborist climbing techniques	
PC 1.2 - JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).	The SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
See previous comments regarding pre-requisite and logged climbing hours.	The SMEs advised that a log book is not required as the Performance Evidence now specifies the nature, volume and frequency of tasks required to demonstrate competency.
The unit application makes no mention of dismantling trees. The use of spikes are mostly associated with tree removal. Add 'where required' or delete.	This unit is about all climbing techniques and doesn't specify which trees. Part of the learning process should highlight when it is applicable to use the different methods.
A Zeppelin bend is widely used for tying two ropes together (usually a pull/tag line). It avoids using the traditional double fisherman, which becomes extremely difficult to untie once loaded, likewise a bowline which can untie if not continually loaded. I would also like to see the Hunters Bend included in this list (for the same stated reason).	SMEs revised the knots list and decided to leave the list unchanged. Individual arborists use different knots and advised that by providing a broad range of knots the individuals have a choice for their specific application.
Very few companies actually use whistle signals. This should be an option not a requirement.	Knowledge Evidence is a cognitive component, students should have an understanding that whistles as a form of communication are still used in some sectors of the industry.
PC 2.5 – The unit application makes no mention of dismantling trees. The use of spikes are mostly associated with tree removal. Add 'where required' or delete PC 2.5.	This unit is about all climbing techniques and doesn't specify which trees. Part of the learning process should highlight when it is applicable to use the different methods.
As previously noted in PC 1.2 - A JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)	SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
'Relationships'? This is totally ambiguous and should be deleted.	This refers to the relationships required to perform the assessment and has been retained. This unit requires that climbing should occur in a work team environment as specified in the Performance Criteria 1.3 Confirm availability of first aid and rescue personnel, equipment and procedures

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB3XX Use arborist climbing techniques	
	2.1 Inspect tree to determine efficient safe access route and method through discussion with work team and 3.7 Communicate with work team during operations according to work site and environmental conditions using methods agreed with work team.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB401 Verify pruning specifications	
RTO NSW	Ref: PE- Dot point 12 prepare contract of pruning... AND relevant authority?
	A SWMS is a pre-written document and does not always relate to site specific hazards and associated risk. A JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).
	Ref: KE dot point 1 sub point 3 pre-operational and safety checks..... Again, this has no relevance to this unit whatsoever? Persons undertaking this UoC WILL NOT have the foundation knowledge to carryout this requirement unless they complete units covering these criterion (eg – pre-requisites). This must be deleted!!!
	Ref: PE number of projects Suggest a minimum of three pruning projects should apply for this.....it is a level 4 UoC which requires solutions to technical and unpredictable problems and they work autonomously.
	Added 'relevant authority' to Performance Evidence.
	SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	Dot point 1 sub point 3 in Knowledge Evidence 'pre-operational and safety checks' has been deleted.
	Performance Evidence has been redeveloped to ensure more stringent outcomes to include different classes of pruning on 3 different trees.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB401 Verify pruning specifications	
<p>Ref: KE dot point 1 subpoint 2 purpose of first aid.... 'Purpose of first aid and rescue personal, equipment and procedures has no relevance to this unit whatsoever? Are first aid, use arborist climbing techniques and undertake aerial rescue pre-requisites? We DON'T NEED the same debacle with demonstrated knowledge from other UoC's that then require a multitude of pre-requisite units....</p> <p>This must be deleted!!!</p>	<p>Dot point 1 sub point 2 in Knowledge Evidence "Purpose of first aid and rescue personal, equipment and procedures" has been deleted.</p>
<p>PC 1.2 - JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)</p>	<p>SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.</p> <p>No action required.</p>
<p>PC 4.3 Prepare a contract? Should this be prepare pruning specifications in accordance with AS4373-2007 and submit....</p> <p>This would then flow into PC 4.4</p>	<p>Performance Criteria 4.3 edited and changed contract to specification.</p> <p>4.3 Prepare specifications for pruning works and submit to client for approval according to workplace procedures and industry standards.</p> <p>Referenced the AS4373 in Knowledge Evidence.</p>
<p>A JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)</p>	<p>SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.</p>
<p>Ref: KE dot point 7 sub point 1 rectify losses Remediate losses, not rectify?</p>	<p>Reworded Knowledge Evidence Dot point 7 sub point 1</p> <ul style="list-style-type: none"> • post pruning tree care including, including: <ul style="list-style-type: none"> • impacts arising from pruning of live tissue • compensatory tree care activities.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB401 Verify pruning specifications		
	'Relationships'? This is totally ambiguous and should be deleted.	This refers to the relationships required to perform the assessment and has been retained. This unit requires that an individual has access to a client and a work team according to the performance criteria. This may be the facilitator/assessor (client) and the student group in a non-work environment. The following Performance Criteria in the unit makes reference to relationships: <ul style="list-style-type: none"> • 1.1 Confirm trees to be pruned and desired outcomes for pruning works according to <u>client</u> brief and <u>arborist</u> specifications • 4.2 Confirm and clarify pruning operations plan with <u>client</u> and <u>arborist</u> • 4.4 Provide specification of pruning operations to <u>work crew</u> for implementation.
	PC 3.4 This is a presumptuous statement. Consider adding if/where applicable or delete.	Deleted Performance Criteria 3.4.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB402 Supervise and audit tee operations		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB403 Perform a ground based tree defect evaluation		
RTO NSW	PC 1.2 - JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)	The SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHCARB403 Perform a ground based tree defect evaluation		
	As previously notes, a JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)	The SMEs were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	'Relationships' client and consulting arborist? This criterion consistently appears in a multitude of UoC's. When one complies with all criterion, what purpose does this serve? It is totally ambiguous and should be deleted.	The assessment should be performed in an environment that best replicates a workplace environment. When PC's specify client, work team or stakeholders these represent relationships. The Assessor should provide the individual being assessed with a work team, client etc. in order to demonstrate the PC outcome. E.g. communicate with the work team, confirm with client etc. Therefore, relationships has been retained.
	As previously notes, a JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC)	The SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	Ref: PE number of trees to assess. 20 individual trees seems terribly excessive to demonstrate competency for a level 4 UoC? I think 10 trees from 10 different species is most appropriate (more than sufficient) and will easily meet the learning outcomes without the excessiveness and repetitiveness requirement of the proposed/current 20? To put this into perspective AHCARB401 Verify pruning specifications currently lists 'one' occasion? See previous comments regarding excessiveness of 20 trees.	The SMEs advised that 20 trees should be assessed and agree with 10 different species. Performance Evidence states: 'There must be evidence that the individual has conducted a whole of tree defect evaluation from the ground for at least 20 individual trees with defects, from at least 10 different species. At least one defect evaluation must also be conducted with a consulting arborist.'
Gov Vic	Recommend adding this unit to the Certificate 3 as they will require this under their new regulations currently under review.	This unit has been added to the Leading hand specialisation in the Certificate III in Arboriculture which can be used as an elective for all specialisations if required.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB404 Conduct a safety audit		
RTO NSW	PC 2.1 - A JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).	The SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.
	As previously noted, a JSA is only one term for a Hazard and Risk Assessment, please also add Hazard and Risk Assessment (HAC).	The SME were satisfied with reference to site specific JSA terminology as it is specific to every site and the term is used and recognised throughout government agencies.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB502 Identify select and specify trees		
Gov NSW	Performance Evidence Relating to testing profiles. Basic field testing should be a requirement. i.e. pH, Field Texture Assessments, Observations of structure, profiling, testing for hydrophobic conditions, infiltration, basic compaction testing, Aggregate stability testing, possibly EC testing. However, testing for chemical/nutrient status can be expensive - i.e. assessing 5 different soils for chemical/nutrient status would require 5 different lab analysis. Possibly, knowledge of sampling techniques for lab analysis and exposure/interpretation of some lab test results for sites.	Performance Evidence for this unit has been redesigned.
	Related to RB3 comment PC5.5 The job related task would be that an Arborist has been engaged to select and specify appropriate trees for a site. The information would need to be conveyed to the client somehow. A brief report outlining and justifying tree selection seems appropriate.	Deleted Performance Criteria 5.5 from Element 5.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB502 Identify select and specify trees		
	<p>Title see RB comment in document Disagree with comment relating to unit name. You would need to identify and select from a range of appropriate species, dependent on client brief and site opportunities and constraints prior to specifying them.</p> <p>I do agree with the possibility of verifying or auditing being part of this unit.</p>	No change to the unit title.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB504 Develop an arboricultural impact assessment report		
No Feedback Received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB506 Prepare arborist reports		
No Feedback Received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB507 Generate tree plans using computer aided design software		
Gov NSW	<p>Performance Evidence Possibly too many trees. If you can do it for one tree you can do it for 20.</p>	Performance evidence has been rewritten to include 10 encroachments.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB507 Generate tree plans using computer aided design software		
		'There must be evidence that the individual has produced plans using computer aided design software and calculated and plotted tree protection zones (TPZ) for at least 20 trees and 10 encroachments across two different sites.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB5XX Specify and Audit tree work		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB5XX Examine and assess trees		
Gov NSW	Ref: RB Comment PE dot point 11 calculated and recorded....at least X trees. At least 2 Trees.	Performance evidence has been updated to require 2 trees.
	PC 6.3 Disagree with the deletion of considering risk against value.	No change to Performance Criteria 6.3 (now 6.5).
	PC 5.5 Disagree with the deletion of 5.5. However, consider changing to 'likely consequence of impact' as it would be impossible to determine the absolute consequence with certainty.	No change to Performance Criteria 5.5.
	Ref: PE dot point 9 select and compare at least X valuation methods..... 4 different monetary valuation methods 2 different amenity valuation methods	The SMEs advised for Performance Evidence to be updated to reflect the following: '..for at least 2 different valuation methods' And '..amenity value of at least 2 different trees'

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB5XX Examine and assess trees	
<p>Ref: Element 4 reordering Data collection here seems to be out of order. consider re-ordering as risk assessment should be target based.</p> <p>1 = 4.2 2 = 4.1 3 = 4.4 4 = 4.3 5 = 4.5</p>	<p>Re-ordered PC's in Element 4 -</p> <p>4.1 Assess relationship of tree to potential targets 4.2 Inspect tree for visual indicators of likely failure of tree or tree parts 4.3 Use basic diagnostic tools to confirm presence and extent of hazards 4.4 Assess likely impact of wind loading on potential for failure of tree 4.5 Assess hazards and determine likelihood of failure.</p>
<p>Ref: Performance Evidence Agree with these PE's</p>	<p>Performance Evidence has been updated.</p>
<p>PC 1.5 Should become an element in its own right as it was in the previous version. Suggest that Element 4. Assess tree health be reinstated to examine and assess trees. This whole unit is risk centric. Again, assessing for hazards and risk is only part of examining and assessing trees.</p>	<p>The SMEs advised that this content already exists as a unit of competency and to replicate it unnecessary. RTO and assessors need to consider sequencing in their course development to ensure individuals can identify trees and can assess tree health before undertaking on this unit.</p>
<p>Ref: re feedback from other to delete Elements 2 and 3.</p> <p>Strongly disagree with the deletion of elements 2 and 3. Valuation of a tree is a significant factor in the management and decision making process. Valuation is used for insurance claims and can be used in some circumstances to apply bonds. Many trees are kept in the landscape because of their historical, cultural, ecological values despite having a heightened risk. You can't ignore the context of the tree in the assessment process!</p>	<p>The SMEs advised to retain Elements 2 and 3 in the unit as they considered it is a component of tree assessments and that there was no need for additional units of competency.</p>
<p>Ref: re Title change to "Visual tree risk assessment"</p>	<p>The SMEs advised to retain the current Title of unit - AHCARBXX5XX Examine and assess trees.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
AHCARB5XX Examine and assess trees		
	<p>Strongly disagree with No. 89 comment related to unit name change. Not all tree assessment relates to risk. Trees are regularly assessed for health.</p>	
RTO NT, Ind NSW	<p>Recommendation received to re-title to: Visual tree risk assessment (VTRA) See note below</p>	<p>The SMEs advised to retain the current Title of unit - AHCARBXX5XX Examine and assess trees.</p>
	<p>Email feedback received to include in the following in the PE.:</p> <ol style="list-style-type: none"> 1. Recommended time frames for risk mitigation controls have been implemented 2. Recommend follow up assessment/audit to determine mitigation controls have been implemented 3. Document photographic images of the subject tree and/or defects and targets 	<p>Recommended time frames for risk mitigation and follow-up assessments have been included in the Performance criteria:</p> <p>6.3 Recommend time frame for implementation of risk mitigation controls</p> <p>6.4 Recommend follow up inspection type and timeframe</p> <p>Reference has also been added to the Performance Evidence:</p> <ul style="list-style-type: none"> • recommended time frames for implementation of risk mitigation controls and follow up inspections • documenting photographic images has been included in the Knowledge evidence for report writing.
	<p>The following was received as email feedback 21/02/19:</p> <p>Title be changed to Visual Tree Risk Assessment (VTRA)</p> <p>That Element 1 be retained unchanged Elements 2 and 3 be deleted Element 4 Be retained unchanged Element 5 be retained with the deletion of 5.5 Element 6 be retained with the deletion of 6.3</p>	<p>See above comments.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB5XX Examine and assess trees		
Industry NT	<p>General "This Unit is too unwieldy for general use in Tree Risk Assessment. In my opinion there needs to be a new terminology; Visual Tree Risk Assessment (VTRA) as opposed to Visual Tree Assessment. (VTA) The Unit in its current form is fine for construction sites, determining various values for Amenity trees, Heritage listed places/trees etc. However, there is a need for a Unit that deals solely with Tree Risk in the context that Risk to life or property over rides all other considerations"</p>	<p>Recommended time frames for risk mitigation and follow-up assessments have been included in the Performance Criteria.</p> <p>6.3 Recommend time frame for implementation of risk mitigation controls 6.4 Recommend follow up inspection type and timeframe.</p> <p>Reference has also been added to the Performance Evidence: 'recommended time frames for implementation of risk mitigation controls and follow up inspections'.</p>
	<p>PC 6.3 My opinion is that Risk to life or property over rides all other considerations including statutory controls, amenity, social or environmental value and these issues should not be taken into account when assessing risk posed by a defective tree. They may be considered when recommending Control Measures eg. fencing off the tree, however - Item 6.3 Consider risk against the value of the tree – is not an option. The only considerations are Failure Potential and the Risk Target Rating.</p>	<p>Recommended time frames for risk mitigation and follow-up assessments have been included in the Performance criteria</p> <p>6.3 Recommend time frame for implementation of risk mitigation controls 6.4 Recommend follow up inspection type and timeframe</p> <p>Reference has also been added to the Performance Evidence: 'recommended time frames for implementation of risk mitigation controls and follow up inspections'.</p>
	<p>General comment 1. Is an Arborist qualified to define the social or environmental value of a tree? I doubt it. There is nothing in any of the Arboricultural Training modules that would equip an Arborist with these skills. 2. There are numerous "Amenity Tree" valuation methods, which, when compared will give a different result to each other. 3. Is an Arborist qualified to determine the consequences on impact of the tree onto the target. This is so subjective as to be "just a guess". An Arborist is not.</p>	<p>Comments noted.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB5XX Examine and assess trees	
<p>Client risk threshold This is a dangerous concept for the Arborist. Regardless of the “Client’s Risk Threshold” the assessor is leaving themselves open to litigation if they do not include all trees above ALARP in their report. According to legal advice I have received from Barristers it is an Arborist’s professional responsibility to record and report on all trees that pose a risk. Whether the client decides to act upon this advice is up to them</p>	<p>Changes made to element 6 with the addition of PC 6.3 and 6.4 for risk mitigation and follow-up assessment timelines.</p> <p>Recommended time frames for risk mitigation and follow-up assessments have been included in the Performance criteria 6.3 Recommend time frame for implementation of risk mitigation controls 6.4 Recommend follow up inspection type and timeframe.</p> <p>Reference has also been added to the Performance Evidence ‘recommended time frames for implementation of risk mitigation controls and follow up inspections’.</p>
<p>Title Change to - Visual Tree Risk Assessment</p>	<p>The SMEs advised not to change this component – see earlier recommendations.</p>
<p>Element 2 and 3 Delete - see notes above</p>	<p>The SMEs advised not to change this component as this is part of a tree assessment.</p>
<p>PC 5.5 Delete</p>	<p>The SMEs advised not to change this component – see earlier recommendations.</p>
<p>PC 5.6 Calculate and document the determinations and level of risk according to the client brief.</p>	<p>The SMEs advised not to change this component – see earlier recommendations.</p>
<p>PC 6.3 Delete</p>	<p>The SMEs advised not to change this component – see earlier recommendations.</p>
<p>Industry NSW Comments "The Visual Tree Risk Assessment/ Risk Management Strategies at the AQF 5 level (VTRA) should be a stand alone unit. I agree with stakeholder’s points 1,4,5,and 6 as a proposed draft. Several points I make are below: "</p>	<p>The SMEs discussed and resolved this issue, as follows:</p> <p>Changes made to element 6 with the addition of PC 6.3 and 6.4 for risk mitigation and follow-up assessment timelines.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AHCARB5XX Examine and assess trees	
<p>"Just been thinking about the method of assessing risk. I have been stuck on the idea that the risk rating is only a trigger to implement an action of remediation work where we are applying it to trees only. So there is a consequence of acting or not. Are we looking at this in the wrong light? To do nothing we can't reduce the applied risk rating to ALARP. At this point we are implementing a management strategy into our risk assessment by making a specification for hazard mitigation to bring the risk to ALARP level.(As soon as we make a recommendation we are implementing a management strategy as a direction to reduce the risk) TRAQ and QTRA require a subject part to fail to formulate the risk rating : We can't predict if the part or other will fail, it is totally subjective, using the above methods a risk for this scenario which formulates a majority of risk assessed in say schools eg; eye stick risk of injury, trip on exposed roots ,toxins may be extremely high but has no fail potential, to exclude this in any assessment would be crazy and neglect. So in a school playground a shrub may be under 6m, with no potential failure at all , using the risk matrix system we can apply a risk rating to an eye stick potential and have a extremely High risk rating, this is without any consideration to failure. By not stating this risk and the rating applied to the tree/area in the report and implementing an action for remediation I would not be doing my job! "</p>	<p>Recommended time frames for risk mitigation and follow-up assessments have been included in the Performance criteria:</p> <p>6.3 Recommend time frame for implementation of risk mitigation controls</p> <p>6.4 Recommend follow up inspection type and timeframe.</p> <p>Reference has also been added to the Performance Evidence 'recommended time frames for implementation of risk mitigation controls and follow up inspections'.</p> <p>Documenting photographic images has been included in the Knowledge evidence for report writing.</p>
<p>"I neglect to see the relationship of the Tree amenity value, its heritage value, or other when assessing for risk, I see it has no part and consider it only in regard to impacting a human life unless specified. So basing the assessment on a part of the tree that may or may not fail is impossible, but should be enough to trigger an action. I therefore see that the subject requires total ability of the assessors to observation of the tree, tree part or other in the context of risk management strategies in the environment in which they stand. Given that there are many methods of determine or calculate a subjective risk rating the qualifications of the assessor can have a varied outcome. Attached is a court document that before any conclusions to this unit are made, should be read. It mentions QTRA /TRAC but more importantly recommends OTHER methods also, the other, can mean the matrix that has a direct link to the AS/NZS 4360 ISO 3100: 2009</p>	<p>The SMEs discussed and resolved this issue, as follows:</p> <p>Changes made to element 6 with the addition of PC 6.3 and 6.4 for risk mitigation and follow-up assessment timelines.</p> <p>Recommended time frames for risk mitigation and follow-up assessments have been included in the Performance criteria:</p> <p>6.3 Recommend time frame for implementation of risk mitigation controls</p> <p>6.4 Recommend follow up inspection type and timeframe.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB5XX Examine and assess trees		
	<p>Risk Management. I further supports what Bill has been advocating on audits as part of the risk assessment process. This point I discussed with the Minister Karen Andrews office (Ian Adams) during our meeting in Canberra, the post audit of risk assessment once the mitigation work had been completed, adjustment to the assessment must then be made where the risk has changed to ALARP level ,the report can then be closed off. It appears not to be standard practice in the tree industry but is in most other risk management strategies. I do an audit post work to protect my clients. So again there is a considerable amount of detail to cover in this unit and incorporation of the VTRA/ Risk Management strategies and will further align with the AS4360. Simple. As Industry represented on this panel I expect this to be unit to be of a standard that we are using at the coal face. Simple!</p>	<p>Reference has also been added to the Performance Evidence 'recommended time frames for implementation of risk mitigation controls and follow up inspections'.</p> <p>Documenting photographic images has been included in the Knowledge evidence for report writing.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB5XX Diagnose tree diseases		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB603 Interpret diagnostic test results drafts available		
Industry NSW	<p>Application Is this necessary? Sending test samples to a lab would have the results explained as part of the labs assessment.</p>	<p>The SMEs advised that this unit is about the person interpreting test results that may have been performed.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB604 Measure & improve the performance of urban forests		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB605 Provide consultation in a legal framework		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB606 Develop an operational tree management plan		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB607 Review and develop strategic tree policy		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB801 Contextualise diagnostic tests		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB802 Develop an urban forest management framework		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB803 Analyse edaphic interactions of trees and structures		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB8XX Analyse mycology cultures		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB8XX Analyse tree structure and biomechanics		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB8XX Conduct an entomology research project		
No feedback received		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB8XX Research urban forest performance		
No feedback received		

Summary of feedback on skill sets

The feedback was generally supportive of the two new skill sets, with some concerns expressed for the value of the Introduction to Arboriculture Skill Set. This skill set was created from the entry requirements for the revised Diploma of Arboriculture transitioning from a related occupations. Recommendation were also made for additional or alternative units of competency to be added to the Basic Tree Worker Skill Set, but the skill has remained unchanged, as increasing its size would make it too close to the redesigned Certificate II.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCSSXXXX Basic Tree Worker Skill Set		
RTO NSW	Consider different unit other than Control traffic with stop-slow bat. Maybe stump grinder.	The SMEs advised that with the new design to the Certificate II qualification, the units in this Skill Set should not be changed.
RTO WA	Consider replacing FWPCOT2237 and FWPCOT2239 with AHCMOM213 Operate and Maintain Chainsaws as this unit is from AHC training package and better meets the entry level, basic tree worker required skills. Current assessment requirements for FWPCOT2237 require repair tasks not appropriate for this level of worker (starter and clutch repairs) Current assessment requirements for FWPCOT2239 have made this unit beyond the level required for entry level, basic tree worker and are also very difficult to deliver in a simulated training environment.	The FWP units have been retained as they best meet industry requirements. The SMEs advised that operators of chainsaws should have the capacity to perform basic chainsaw repairs and particularly as they will generally be ground based tree workers.
RTO NSW	Change of units available a. Delete RiiWHS205D Control traffic b. Add AHCARB206 Operate and maintain stump grinding machines	The SMEs advised that the new reduced Certificate II Arboriculture captures the outcomes for these so does not warrant including in this skill set.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO SA	I would also like to add, a proposal for a short Cert III was shown, which I thought was good, consisting of the following units (from memory); HLTAID003 Provide first aid AHCARB207 Perform ground based rigging FWPCOT2237 Maintain chainsaws FWPCOT2239 Trim and cut felled trees FWPFGM Operate a mobile chipper/mulcher FWPCOT2236 Fall trees manually (basic)* (I suggested this additional unit during the consultation workshop).	The SMEs advised that the new reduced Certificate II Arboriculture captures the outcomes for these so does not warrant including in this skill set.
AHCSSXXXX Introduction To Arboriculture Skill Set		
Industry WA	Really? Is there sufficient numbers to warrant this skills set for this target group? Won't the conservationists be annoyed that they haven't been included AHC?	This skill set was created from the entry requirements for the revised Diploma of Arboriculture transitioning from a related occupations, including landscaping and forestry. It also provides direct credit transfer into the redesigned Certificate III.
Industry WA	Insufficient as entry level requirement for AQF 5. Strongly disagree with this concept. RTOs may consider 5 years' experience in a wheat field suitable for entry into diploma in arb to get bums on seats.	The entry requirements have not been changed as the SMEs advised the three level 3 units provide sufficient depth of arboriculture knowledge to succeed in this qualification.
RTO WA	Stilating that is skills set is sufficient to enter into a Diploma may results in students completing 3 units seeking direct entry into Diploma. At the very least entry into Dip should be listed as Arboriculture skill set + x amount of year in industry. Additional financial drivers (Vet student loan) apply to Diploma and drive demand for direct entry. It is unreasonable to expect someone who has only completed this skill set with no industry experience to be suitable for Diploma entry	The entry requirements have not been changed as the SMEs advised the three level 3 units provide sufficient depth of arboriculture knowledge to succeed in this qualification.

Summary of feedback on Units of Competency proposed for deletion

During the consultation process, a series of units were proposed for deletion. The units AHCARB310 Perform aerial rigging and AHCARB311 Tie, dress, set and finish arborist knots were unnecessary as individual units and have been combined in the various units that incorporate these skills. The unit AHCARB405 Perform geospatial data collection was felt to be too basic and not sufficient to provide the outcomes industry were seeking and was replaced with two existing units that reflect AQF level 5 outcomes from the CPP training package.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCARB310 Perform aerial rigging		
No feedback received		
AHCARB311 Tie, dress, set and finish arborist knots		
No feedback received		
AHCARB405 Perform geospatial data collection		
No feedback received		