# Medicinal Crops Skills Project

## Summary of Feedback, Responses and Actions

**January 2020**

This project includes the development of three qualifications,13 units of competency and 4 skills sets relevant to skills for cultivation of medicinal cannabis. Draft qualifications, skill sets, and units were developed as a result of initial input from Subject Matter Experts (SME) and were made available for broader stakeholder consultation and feedback from 1 October– 5 November 2019. During this time, feedback was received via email, the Skills Impact Feedback Hub, at face-to-face workshops and webinars, site visits, and by telephone. Input was sought and received from 44 stakeholders around Australia, including from industry representatives, registered training organisations (RTOs), regulatory bodies and government bodies such as state departments and State Training Authorities. Please visit Visit the Skills Impact website to view a list of the qualifications, units of competency and skills sets that were available for feedback during this period.

Below is a breakdown of feedback received, indicted by national and/or state levels and also by categorisation of industry (employer/employee), industry associations, unions, RTOs and/or Government departments.

| | ACT | NSW | NT | Qld | SA | Tas | Vic | WA | National |
|---|---|---|---|---|---|---|---|---|---|
| **Industry (employer / employee)** | | | | | | | | | |
| **Industry association** | | | | | | | | | |
| **Union** | | | | | | | | | |
| **Registered Training Organisation (RTO)** | | | | | | | | | |
| **Government department** | | | | | | | | | |

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

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

Below is a ***Summary of Feedback, Responses and Actions Report*** regarding the draft qualifications, units of competency and skill sets developed and reviewed for the Medicinal Crops Project to date, and how these have been dealt with. This involves a consideration of the information provided, views of industry stakeholders and from people who are part of the Subject Matter Expert (SME) working group process. Resolutions are constructed to consider the needs and views of stakeholders to the extent possible, and to comply with the *Standards for Training Package 2012*. The resolutions may represent a compromise on one or more stakeholder views with the aim of a workable outcome for industry, State and Territory Training Authorities (STAs) and training providers.

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

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# Summary of Feedback on Draft Qualifications

## General Qualification Comments – Three New Qualifications (Certificate II, III, and IV)

| Stakeholder Comments and Identified Issues | | Consideration and Proposed Resolution |
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| 1. Industry Eployee WA | I last week looked through the 'medicinal crop' qualification proposals and confess to having concerns about the need for crop specific courses and all the issues that additional units and qualifications create for providers and industry alike. My personal view is that the production of hemp and other medicinal crops is agronomically and business fundamentally, the same as the production of any other crop and the specifications of new courses being designed around this one crop is the equivalent of saying we need a standalone course for Chia production…which of course we don't.<br><br>I certainly get that there are (and will increasingly be) special imposts on medicinal crops in the form of government and other regulatory requirements, and that issues like security are 'new' compared to commercial grain/fruits/vegetable production. I have no issue with these important units being a part of a course, however have concerns about essentially replicating units in the Production Horticulture (and other) qualifications for a 'niche' crop that is easier to produce and manage than many other crops lumped under other qualifications.<br><br>There is a need I believe to keep qualifications 'generic' with specialised units forming the 'major' rather than numerous specific qualifications which create inflexibility (for graduates as much as anyone), low enrolments, and difficulty in delivery. For developing crops such as Hemp, the way it unfolds may also mean the new qualifications are redundant before they really take effect, for example Hemp will likely be grown in both protected horticulture environments but also in broadacre environments….and | Feedback has been carefully considered and taken to wider Subject Matter Expert group and industry representatives. Their advice supported the following. See also specific comments in response below (rows 5 to 14) regarding factors unique to the production and cultivation of medicinal cannabis.<br><br>Consultation with industry stakeholders who work directly in the cultivation and production of medicinal crops identified new, specialist skills training for medicinal cannabis only. Existing qualifications in Production Horticulture and Protected Horticulture were looked at for coverage of medicinal crops overall and it was recognised that cultivation and production of broadacre crops, such as poppies and hemp, can be covered by existing qualifications related to Production Horticulture.<br><br>Medicinal cannabis is currently grown under protected cropping structures and specific activities required for growth and harvesting of medicinal cannabis in a licensed commercial facility such as implementing security and compliance with legislative requirements are core requirements. In addition, food safety is identified as a core requirement in current Protected Horticulture qualifications which isn't relevant to medicinal cannabis (as it is produced as a pharmaceutical agent rather than as a food source). The original brief was to look broadly at medicinal crops and while most of these crops were found to fit in streams within existing qualifications, this wasn't the case for medicinal cannabis. |

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| | what applies as best practice to one will be significantly different to the other. | |
| 2. RTO NSW | I can understand the need for security etc, but I do not see a reason to have an entire group of qualifications that cover medicinal crops when all these units can fit directly with Production Horticulture. Some on security etc could be added to the various Production Horticulture qualifications. There are other medicinal crops other than Cannabis so why have RTO's register and provide learning material on another set of units when most of is going to be the same as growing any other crop?<br><br>For example, the mushroom units are embedded in Production Horticulture so why not the medicinal crop as well. This really is a waste of time and money for many RTO's.<br><br>Most students enrolling with an RTO to study medicinal crops will need to be doing the practical components of the unit. Generally, within Production Horticulture students can choose which crops they wish to specialise in once they understand the principles. Those working on medicinal crop operations will be learning the growing procedures on the job.<br><br>These students can then select the security and particular units which are specific to medicinal crops. | Feedback has been carefully considered and taken to wider Subject Matter Expert group and industry representatives. Their advice supported the following. See also specific comments in response below (rows 5 to 14) re factors unique to the production and cultivation of medicinal cannabis.<br><br>Consultation with industry stakeholders who work directly in the cultivation and production of medicinal crops identified new, specialist skills training for medicinal cannabis only. Existing qualifications in Production Horticulture and Protected Horticulture were looked at for coverage of medicinal crops overall and it was recognised that cultivation and production of broadacre crops, such as poppies and hemp, can be covered by existing qualifications related to Production Horticulture.<br><br>Medicinal cannabis is currently grown under protected cropping structures and specific activities required for growth and harvesting of medicinal cannabis in a licensed commercial facility such as implementing security and compliance with legislative requirements are core requirements. In addition, food safety is identified as a core requirement in current Protected Horticulture qualifications which isn't relevant to medicinal cannabis (as it is produced as a pharmaceutical agent rather than as a food source). The original brief was to look broadly at medicinal crops and while most of these crops were found to fit in streams within existing qualifications, this wasn't the case for medicinal cannabis. |
| 3. Government WA | Upon review of the qualifications, I am wondering why there is a need for three qualifications in this area when skill set/s and units should be sufficient to address the specific nature of industry requirements? It is my belief that additional units should be added to existing qualifications rather than developing new qualifications thereby assisting the learner develop a broader set of skills to work across the agriculture/horticulture industry.<br><br>I queried the qualifications with my colleagues in other States and Territories and received feedback from South Australia that they did not believe there was a need for a | Feedback has been carefully considered and taken to wider Subject Matter Expert group and industry representatives. Their advice supported the following. See also specific comments in response below (rows 5 to 14) re factors unique to the production and cultivation of medicinal cannabis.<br><br>Consultation with industry stakeholders who work directly in the cultivation and production of medicinal crops identified new, specialist skills training for medicinal cannabis only. Existing qualifications in Production Horticulture and Protected Horticulture were looked at for coverage of medicinal crops overall and it was recognised that cultivation and |

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| | Certificate II or Certificate III but that perhaps there was a need for a Certificate IV. They felt skill sets and units could address the lower level requirements. | production of broadacre crops, such as poppies and hemp, can be covered by existing qualifications related to Production Horticulture.<br><br>Medicinal cannabis is currently grown under protected cropping structures and specific activities required for growth and harvesting of medicinal cannabis in a licensed commercial facility such as implementing security and compliance with legislative requirements are core requirements. In addition, food safety is identified as a core requirement in current Protected Horticulture qualifications which isn't relevant to medicinal cannabis (as it is produced as a pharmaceutical agent rather than as a food source). The original brief was to look broadly at medicinal crops and while most of these crops were found to fit in streams within existing qualifications, this wasn't the case for medicinal cannabis. |
| 4. Industry Association WA | There is no need for these qualifications. There is no occupational outcome these qualifications that is specific to medicinal cannabis.<br><br>Certificate II<br><br>Horticulture production skills at the Cert II level would be common across Production Horticulture and Protected Cropping. All that is needed is one (or maybe two) unit/s around Cannabis legislation, security and quality control. The fact that most of the Units taken from other Quals shows this. These workers will be horticulture or nursery assistants and should be able to work across a range of plants/crops.<br><br>Certificate III<br><br>These workers will be horticulture or nursery workers and should be able to work across a range of plants/crops.<br><br>Certificate IV<br><br>Horticulture production skills at the Cert IV level are common across Production Horticulture and Protected Cropping. All that is needed is one (or maybe two) unit/s around Cannabis legislation, security and quality control. The fact that most of the Units taken from other Quals shows this. These workers will be horticulture or nursery | Feedback has been carefully considered and taken to wider Subject Matter Expert group and industry representatives. Their advice supported the following. See also specific comments in response below (rows 5 to 14) re factors unique to the production and cultivation of medicinal cannabis<br><br>Consultation with industry stakeholders who work directly in the cultivation and production of medicinal crops identified new, specialist skills training for medicinal cannabis only. Existing qualifications in Production Horticulture and Protected Horticulture were looked at for coverage of medicinal crops overall and it was recognised that cultivation and production of broadacre crops, such as poppies and hemp, can be covered by existing qualifications related to Production Horticulture.<br><br>Medicinal cannabis is currently grown under protected cropping structures and specific activities required for growth and harvesting of medicinal cannabis in a licensed commercial facility such as implementing security and compliance with legislative requirements are core requirements. In addition, food safety is identified as a core requirement in current Protected Horticulture qualifications which isn't relevant to medicinal cannabis (as it is produced as a pharmaceutical agent rather than as a food source). The original brief was to look broadly at medicinal crops and while most of these crops were found to fit in streams within existing qualifications, this wasn't the case for medicinal cannabis. |

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| | supervisors and should be able to work across a wide range of plants/crops. | |
| 5. Industry Association NAT | The medicinal cannabis sector has some unique features due to the regulatory environment in which it operates<br>This impacts:<br>• Employee pool<br>• Required knowledge of employees in terms of the regulatory framework<br>• Nature of production due to need comply with regulatory requirements but also because combines elements agriculture, horticulture, protected crops and pharmaceutical systems.<br>The focus currently is on production in advanced controlled environments (housed within indoor facilities) and develops a raw material to meet GMP manufacturing and 'Australian quality' requirements. Thus, it is differentiated to commodities that are predominantly grown using protected cropping methods.<br>As such, I support the development of new qualifications etc as the medicinal cannabis legal framework does influence production practices and employment needs.<br>It was suggested on the webinar that the three A units become core units and I would support this has provides both the employee and medicinal cannabis company flexibility and potentially better outcomes. | This feedback is in support of proposed training package components and explains factors that are unique to the production and cultivation of medicinal cannabis compared to other horticultural crops in general.<br>Group A elective units now included as core units. |
| 6. Industry Employer SA | Our objective as an industry, at a State level, is primarily to engender the highest level of trust and assurance in a sector which is emerging from a historical position of prohibition.<br>While we acknowledge that certain elements may be seen as duplicative viz other horticultural best practices, we need to be very clear about the need to go above and beyond | This feedback is in support of proposed training package components and explains factors that are unique to the production and cultivation of medicinal cannabis compared to other horticultural crops in general. |

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| | these norms with a fully integrated and credibly structured 'whole of system' approach to ensure there we minimise any risk or ambiguity in the supply chain structure.<br><br>While not having any specific critique around the content itself (it looks ok to us), we fully support - and encourage the design, development and adoption of an integrated system such as that proposed.<br><br>For those that may not wish to use it, they will still have the choice, but for those who see benefit, it absolutely needs to be in place. | |
| 7. Industry Employer NAT | I wanted to reiterate the feedback I've given before, from an industry perspective, that medicinal cannabis skills training should NOT be folded into an existing horticulture program; but should be an entirely separate training package (as should all medicinal crops). Employment skill requirements for the medicinal cannabis industry need: adequate volume, thorough content, appropriate focus on medicinal cannabis-cultivation businesses.<br><br>This can't be accomplished by a few units added to a horticulture package – employees will need far more medicinal-cannabis-cultivation specific training. Medicinal crops are very different to other types of production horticulture and must be grown at a higher purity standard, which impacts all aspects of cultivation and production.<br><br>1. Growing conditions for cannabis can risk the production of plants that are contaminated, including toxins that would harm end-users (patients/public health) such as using pesticides, or heavy metals or otherwise contaminated soils, or producing products contaminated with various moulds, e-coli, other bacteria/toxins/viruses, plant pests and diseases (e.g. when proper cultivation procedures and employee hygiene for cannabis plants are not closely followed and monitored/tested).<br><br>2. Medicinal crops of high value are more regulated and restrictive in cultivation methods; every aspect, from site | This feedback is in support of proposed training package components and explains factors that are unique to the production and cultivation of medicinal cannabis compared to other horticultural crops in general. |

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| | visitor health declarations to deliveries of incoming seeds/soil/substrate, to water quality to soil contaminants etc., must be tested throughout cultivation.<br><br>3. Security is also mandatory; as is employee ethics training, due to the high value of the crop (highest crop value possible).<br><br>4. Millions of dollars in crop value are at stake for every commercial cannabis crop and the industry itself could be worth billions to Australia's GDP/GNP.<br><br>5.If GACP/GMP is not followed precisely during cultivation, losses not only ruin businesses, but the reputation of the Australian medicinal cannabis supplier market is at stake (a large part of cultivation is to meet global medicinal cannabis export markets of high value).<br><br>The industry opinion is this is not typical horticulture and requires its own training package, including hands-on experience with cannabis plants if not crops themselves.<br><br>Delivery of training must also have practical hands-on experience which will likely require RTO's to network with licenced production houses and/or to get their own cannabis licences from the ODC so long as they can meet GACP/GMP and ODC licencing requirements including security and GACP cultivation conditions. | |
| 8. Industry Employer/RTO Victoria | The packaging rules of existing quals and the available units of competency limits the RTOs ability to design the qualification the industry wants. I agree that there are existing units of competency that are relevant to medicinal crops. However, I found that too many units of competency 'almost' fit the context but then required me to fit my design to suit the unit and made them less relevant to the industry context. The units that have been created as part of this project did not in fact exist in any other qual that I could find. From an industry perspective, I believe the new quals and the new units will be of great value and prepare people to work in this unique industry which combines horticultural | This is in response to stakeholder feedback (rows 1 to 4).<br><br>For context, this response is from an Industry based RTO currently delivering training in this sector using existing qualifications and units of competency. However, intend to use new qualifications and units of competency specific to medicinal cannabis developed as part of this project once if they are endorsed and available on the national register. |

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| | production with pharmaceutical production - and the production of a narcotic medicine. I also believe that these quals will support people to move across sectors. | |
| 9. RTO / Industry Employer / Government NSW and NT (webinar discussion) | RTO NSW- Group A electives in Qualifications should be core – why 'at least one?'<br>Industry Association - security and hygiene are core – depends on size of workforce as to whether or not all three from group A should be core. Could provide broader coverage for learners but no strong view either way.<br>RTO NSW - Include extra production horticulture units such as plant nutrition in elective.<br>RTO NSW – how does a 'simulated environment' work in a delivery sense? | Group A elective units now included as core units.<br>In regard to the question about how does a 'simulated environment' work in a delivery sense, Industry Employer responded - 'Training providers will have to work with industry in delivery models'.<br>Plant nutrition covered in Elective units in qualifications related to managing a controlled growing environment (AHTPHT503) and integrated in medicinal cannabis growing specific units. |
| 10. RTO QLD | 'Quals are great – what industry need'.<br>Are there any entry requirements? | Thank you! The qualifications are based on industry needs. Based on access and equity principles, there are no entry requirements for each of the qualifications. |
| 11. Industry Employee NSW | Skilled workforce is required for this rapidly growing industry.<br>Pollination – cross pollination can be an issue and can impact on quality (e.g. industrial hemp crop crossed with backyard strains).<br>Training – 'will help a kid that wants to do this – will be a benefit to enrol in these qualifications'.<br>'This project is extremely relevant to a dynamic industry and something that great thought should be made to get the courses effective for the skills shortages of the industry'. | This feedback is in support of the proposed training package components.<br>Comment provides reasoning for closed cropping structures for medicinal cannabis. |
| 12. RTO/Industry Employer Victoria (Consultation Workshop) | Question re Qualifications – why only 3 imported units?<br>Entry requirements – where should it be included that checks on 'fit and proper person' for employment in this sector (e.g. additional regulatory/police checks compared to other industries)?<br>Would it be possible to deliver in simulated environment? | Elective units have been selected to ensure relevance to the medicinal cannabis industry. More than three imported units can be selected for Certificate III Qualification (4) and certificate IV qualification (5).<br>Checks on 'fit and proper person' addressed in AHCMDC201. |

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| | Are qualifications suitable for traineeships? | Delivery - most likely a combination of workplace and simulated. For challenges around training in the workplace, 'virtual reality' can be useful tool.<br><br>Industry supports the delivery of three qualifications as traineeships programs. |
| 13. RTO/Industry Employer and Government SA (Consultation Workshop) | Packaging rules of current production horticulture and protected horticulture qualifications discussed as not meeting industry needs. Producing a pharmaceutical product not 'food.'<br><br>Question - Biosecurity unit only in level IV qual? Very relevant for the industry which is expected to grow in the future. | This feedback is in support of the proposed training package components specifying that packaging rules of existing qualifications do not meet skills required for growing medicinal cannabis in a licenced commercial facility.<br><br>Biosecurity is in Knowledge Evidence section of draft units of competency.<br><br>Comments supporting proposed training package noted. |
| 14. Industry Employer Victoria | Just had a very quick look and have some suggestions.<br><br>The main recommendation I have is in relation to permitting so many wildcard electives (from other endorsed programs).<br><br>It's too many in my view– e.g. for a cert III, they can nearly do 30% from anything other than the cultivation industry courses.<br><br>Ratio of 'must do' to 'anything will do' elective units, e.g. allowing 1 out of 3 'wildcard' electives from any training package is too many for this very precise and highly regulated industry. Esp in Cert IV where it's 7 of 15 (nearly 50% 'wildcard')?<br><br>Some alternate add-ins for your elective lists below, after a very brief review of them.<br><br>Examples:<br><br>for a Cert IV ? (15 units) they only need 8 relating to cannabis, the rest can be from anything - that's not enough industry specific units.<br><br>You should make a program like that (Cert IV) have only 3 wildcards of the 15 – at most. Ideally only 2, the rest should | Feedback adopted.<br><br>Group A elective units now included as core units. Electives units have been selected to ensure relevance to the medicinal cannabis industry.<br><br>Feedback considered and revised packaging rules now state:<br><br>Certificate II<br><br>*To achieve this qualification, competency must be demonstrated in:*<br><br>• *12 units of competency:*<br><br>• *5 core units plus*<br><br>• *7 elective units (can include up to three Imported units from any currently endorsed Training package or accredited course).*<br><br>Certificate III<br><br>*To achieve this qualification, competency must be demonstrated in:*<br><br>• *14 units of competency:*<br><br>• *6 core units plus*<br><br>• *8 elective units (can include up to four Imported units from any currently endorsed Training package or accredited course).*<br><br>Certificate IV |

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| | be from the accredited programs or a related package like AHC etc.<br><br>Overall, for Cert III etc.<br><br>I'd probably narrow wildcard units down to not more than 2 electives wildcard (from any currently endorsed package).<br><br>OR better yet, define the specific currently endorsed packages they can have the 3 or 4 wildcard units from --<br><br>(e.g. probably just add them as an elective to the package in list B per the VET structure).<br><br>e.g. add in electives from agriculture, farming, etc. – specific industries that are compatible, rather than so many completely wildcard.<br><br>Otherwise I'd limit wildcards to 2 electives MAX –<br><br>And give them more choices for electives from LIST B in the packages. | *To achieve this qualification, competency must be demonstrated in:*<br><br>*• 15 units of competency:*<br><br>*• 6 core units plus*<br><br>*• 9 elective units (can include up to five Imported units from any currently endorsed Training package or accredited course).* |

## Specific Qualification Comments and Feedback

| Stakeholder Comments and Identified Issues | | Consideration and Proposed Resolution |
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| **Certificate II in Medicinal Cannabis Cultivation and Production** | | |
| RTO QLD | Cert II Elective group A – shouldn't all 3 units be included in Core? (need to balance against flexibility). | Feedback adopted.<br><br>Group A elective units now included as core units. |
| Government WA | Cert II units 'at least one' – should all three be core as participants should develop skills in all aspects of the business rather than only one specific area. | Feedback adopted.<br><br>Group A elective units now included as core units. |

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| Industry Employer Victoria | Insist on them choosing at least 2 electives from the A list – not just 1 elective from A list (otherwise not enough cannabis specific, they need 2 from Group A).<br><br>And 6 more from either A or B.<br><br>Again, not have 3 of 12 wildcard electives – far too many (3 'anything goes' of 12 units).<br><br>Allow a maximum of 2 wildcard electives at most – as mentioned above.<br><br>Also – not sure that the packaging TLIA2011 is suitable for pharmaceuticals but probably a start?<br><br>Suggestion: I'd suggest considering adding these units to the B list/elective list if not already in these packages.<br><br>AHCCHM201 - Apply chemicals under supervision.<br><br>It's very precise as not all chemicals can be used, but like all farms, there will be some.<br><br>AHCBER303 - Carry out emergency disease or plant pest control procedures at infected premises (Release 1).<br><br>And maybe add these units to B list of electives to all training packages (primarily from organic farming):<br><br>AHCAGB402 - Analyse and interpret production data (Release 1)<br><br>AHCCHM403 - Prepare safe operating procedures for calibration of equipment (Release 2)<br><br>AHCIRG410 - Select and manage pumping systems for irrigation (Release 1)<br><br>AHCIRG426 - Evaluate water supply for irrigation (Release 1)<br><br>AHCIRG433 - Manage irrigation systems (Release 1). | Feedback considered and partially adopted.<br><br>Group A elective units now included as core units.<br><br>Suggested units to be included in qualification elective lists were considered by project team members and while most of these units have some relevance to medicinal cannabis cultivation and production, a detailed review of the units show that most of them are not fit for purpose for these qualifications. That is, the units either contain gaps or are areas that go beyond the job outcomes of the qualifications.<br><br>Certificate II packaging rules have been revised and state:<br><br>*To achieve this qualification, competency must be demonstrated in:*<br><br>• *12 units of competency:*<br><br>• *5 core units plus*<br><br>• *7 elective units (can include up to three Imported units from any currently endorsed Training package or accredited course)* |
| Industry Association WA | I don't understand why these 2 words (Cultivation and Production used in title). are being used. Is there a difference? Cultivation means working the soil - my | Feedback considered and referred to SME group for advice. See response below.<br><br>The wording (Cultivation and Production in title) reflects the legal phrase used for this industry. Cannabis can be grown outside as well as in |

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| | understanding is that much medicinal cannabis will be grown in protected cropping, i.e. no cultivation needed.<br>Moreover, it is important to use terms that relate to the occupational outcome. The word 'horticulture' needs to be in the qual title. | greenhouses and indoor grow room. Cultivation is the terms used in the industry. |
| Industry Association WA | I understood, but may be wrong, that WH&S Units were being removed in favour of embedding OH&S in all Units (reference to AHCWHS201 in Core). | The content covered in AHCWHS201, i.e. health and safety legislative requirements, risk control and practices, is too comprehensive to fully embed into other technical units. The need for a standalone health and safety unit as core indicates its significance for industry. |
| Industry Association WA | Propagation, growing and harvesting of medicinal cannabis is not significantly different to most other horticultural crops, and possible simpler. So, no need for specific Units (referring to Medicinal Cannabis specialist units - group A). | Advice sought and Industry responses to this feedback includes:<br>'the context in which it is grown, and the techniques used in propagating, maintaining and harvesting are unique to medicinal cannabis. There are particular regulatory requirements that would not apply to other crops that are not considered narcotics'.<br>See also responses in rows 5 to 14 (comments related to all three qualifications). |
| RTO Victoria | No issues with qualification.<br>This unit (AHCMDC202) has PC 2.1 Assist with taking cuttings, sowing seed or preparing tissue culture as required Suggest listing following units in elective bank:<br>MSL973013 Perform basic tests<br>MSL973016 Perform aseptic techniques<br>MSL974025Prepare tissue and cell cultures. | Feedback considered and mostly adopted.<br>Units MSL973013 Perform basic tests and MSL973016 Perform aseptic techniques have been added to Group B electives, however MSL974025 Prepare tissue and cell cultures not adopted as the skills and knowledge of this unit goes beyond the skills and knowledge required of cultivation assistants. |
| **Certificate III in Medicinal Cannabis Cultivation and Production** | | |
| RTO Victoria | Only suggestion is to consider adding the unit AHCWRK207 Collect and record production data. Should be 3 remaining not 4. If 4, electives add up to 12 unit and packaging states 11. FDFTEC3001A Participate in HACCP team could be added to electives as Cert IV has HACCP unit in electives. | Feedback considered and mostly adopted.<br>Unit AHCWRK207 Collect and record production data has been added to elective bank. Error in packaging rules corrected. FDFTEC3001A Participate in HACCP team not added to electives as feedback suggested that HACCP is not relevant to the medicinal cannabis/pharmaceutical industry. HACCP unit also removed from Certificate IV qualification. |

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| | Prerequisite MSL973016 need a statement on prerequisite requirement with *. | A prerequisite requirement table has been added to the qualification to ensure that the prerequisite requirement for MSL973016 is clear. |
| Industry Association WA | At the Cert III level a worker should be able to propagate, grow and harvest. These units should be core not electives (referring to group A medicinal Cannabis specialist units). | Feedback adopted.<br>Group A elective units (covering propagation, growth and harvest) now included as core units. |
| Industry Association WA | Propagation, growing and harvesting of medicinal cannabis is not significantly different to most other horticultural crops, and possible simpler. So, no need for specific units. | Advice sought and Industry responses to this feedback includes:<br>'the context in which it is grown, and the techniques used in propagating, maintaining and harvesting are unique to medicinal cannabis. There are particular regulatory requirements that would not apply to other crops that are not considered narcotics'. |
| Industry Association WA | AHCBIO305 Apply biosecurity measures should be in core. | Feedback considered and advice provided.<br>AHCBIO305 is not suitable for this qualification as it is more relevant to farms. However, biosecurity is integrated in Knowledge Evidence of units of competency. |
| RTO Victoria | Remaining units should be 3, if 4 electives add up to 12. | Feedback noted and addressed.<br>Packaging rules for certificate II level qualification have been revised accordingly.<br>Certificate III<br>*To achieve this qualification, competency must be demonstrated in:*<br>• *14 units of competency:*<br>• *6 core units plus*<br>• *8 elective units (can include up to four imported units from any currently endorsed Training package or accredited course).* |
| **Certificate IV in Medicinal Cannabis Cultivation and Production** | | |
| RTO QLD | Cert IV – would they be employing people? Response at the time - Probably not but in packaging rules have 5 imported units | The imported elective ruling allows for differing tasks in job outcomes. |

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| Government SA | Cert IV learners are 'monitoring a controlled environment' not just 'working in a controlled environment'. | Feedback noted – confirmed that 'monitoring of controlled environment' is addressed in certificate IV level units. |
| RTO Victoria | Remaining electives should be 4 not 5. If 5, electives add up to 13 unit and packaging states 12. Prerequisite MSL973016 for this unit need a statement on prerequisite requirement with *. Could also list MSL973016 in list for Gr B, otherwise must come in an imported unit. MSL75033 also has prerequisite MSL907316 Perform aseptic techniques. | Feedback noted and addressed.<br>Packaging rules for all three qualifications have been revised. Prerequisite requirements table added to indicate prerequisite units.<br>MSL907316 Perform aseptic techniques added to elective bank. |
| RTO/Industry Employer Victoria | Agree with above comment (via feedback hub) that context also needs lab technique electives. | Feedback adopted.<br>MSL907316 Perform aseptic techniques added to elective bank. |
| Industry Association WA | Great wording!! (referring to the Qualification description). | Comment noted - Thank you! |
| RTO Victoria | Should be 4 remaining not 5. if 5 electives add up to 13. | Feedback noted and addressed.<br>Package rules for certificate IV level qualification have been revised accordingly<br>Certificate IV<br>*To achieve this qualification, competency must be demonstrated in:*<br>• *15 units of competency:*<br>• *6 core units plus*<br>• *9 elective units (can include up to five Imported units from any currently endorsed Training package or accredited course).* |
| RTO Victoria | Has prerequisite MSL973016, prerequisite should be listed in electives otherwise comes in under imported, therefore limiting number if imported. | Prerequisite requirements table added to indicate prerequisite units. MSL907316 Perform aseptic techniques added to elective bank. |
| Government QLD | The use of the MSL units are good but there should be some further expansion as there is no testing of the plant material covered in the by the qualification as e.g. perform basic tests (MSL973017) would fit in well to the design of the program. | Feedback adopted.<br>Unit MSL973017 Perform basic tests added to elective bank. |

# Summary of Feedback on Core Units (New)

| **AHCMDC201 Apply security regulatory requirements to work in the medicinal cannabis industry** | | |
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| RTO QLD | AHCMDC201 Assessment Requirements – suggest 'a minimum of three'. | Feedback considered and referred to wider SME group. Advice provided included:<br>Tasks, such as entering and exiting access points and applying disposal and destruction procedures of material waste need to be demonstrated at least twice. It is not necessary (and adds no value) for some of the tasks for AHCMDC201 to be demonstrated a number of times to be deemed competent, i.e. identified and confirmed obligations as an employee of the medicinal cannabis organisation, identified risks and implications of diversion to illicit use. |
| RTO/Industry Employer Victoria | AHCMDC201 'application useful and practical'.<br>Cycle is 4 months – use the word 'crop' instead of 'grow cycle' in Assessment Requirements.<br>Remove 'Commonwealth' in KE (first dot point) | Feedback adopted.<br>Performance Evidence clarified in all relevant units to, specify X number of plants over X period.<br>'Commonwealth' removed from dot point in KE. |
| Industry Association WA | Is AHCMDC201 required? Seem to be repetition across levels in propagation, growing and harvesting units. | AHCMDC201 has been identified by industry as a critical unit that addresses the security regulatory requirements specific for workers in the industry. While security requirements are referred to in the growing and harvesting units, they do not cover these requirements to the level of depth that is contained in this unit. |
| RTO Victoria | Is this (diversion) referring to police diversion for cannabis offences i.e. the use of cautions, expiations, warnings by police and criminal charge??<br>• If so, should it read diversion for cannabis offences??<br>• 1.2 Identify employee obligations and risks of diversion to illicit use | Feedback adopted.<br>PC1.2 amended to " Identify employee obligations and risks of diversion to illicit use".<br>Dot point in PE amended to read " entered and exited at least two site access points according to security procedures'. |

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| | In Performance Evidence, Entering and exiting access points does not appear in the PCs. Is that applied security procedure to enter and exit | |
| Industry Employer NAT | This unit provides a good overview.<br><br>In PC1.1 replace 'identify' with "complete the required training'. In PC2.1 replace 'Identify' with "be able to'. In 2.1 replace 'apply' with 'comply with' In 2.2 should container be 'quantity'? Add as 3.5 3.5 Notify the state and/or federal regulator of incidents or emergencies in accordance with company procedures and licence conditions. Add 4.1 "store, dispose." Add as 4.4 Report any discrepancies in recorded cannabis weights according to workplace procedures and regulatory requirements | Feedback considered and mostly adopted.<br><br>PC2.2 'container restrictions' amended to "container quantity restrictions. Notifying the regulator goes beyond the role of the cultivation assistant or technician<br><br>'Store' add' to PC4.1. Amended PC3.4.to read "Report and record completion of disposal and destruction activities, including any discrepancies in recorded cannabis weights, according to workplace procedures and regulatory requirements".<br><br>Suggestion to PC1.1 does not align to the outcomes of Element 1. Suggestion to PC2.1 too close to its element |
| **AHCMDC202 Assist with propagation of medicinal cannabis** | | |
| Industry Employer NAT | In relation to Element 1, This summary is extremely vague and generic across all the units. It's worth mentioning the following:<br><br>Confirmation of authorised cutting quantities, cultivar and mother plant crop, in line with relevant ODC permit<br><br>Inspection of cuttings tools, e.g. secateurs and single-use blades, to ensure clean<br><br>Sanitisation of propagation tools using 70% alcohol (e.g. IPA), ensuring appropriate contact time is achieved and tools are dry before starting activity. Comments made against 2.1 Tissue culture is another whole world - hard to bolt this on. 2.2. Pre-wetting of media using appropriate nutrient solution should take place prior. Ensure media is drained appropriately to avoid excess moisture. There should be some high-level understanding of cuttings technique, e.g. clean final cut, removing excess foliage, not delaying before placing cutting in media/cuttings storage vessel full of water, 2.3 Company specific, but generally cutting quantity/cultivar/batch no./ODC permit reference. 2.7 Mention QA documentation specifically: crop batch | Feedback adopted.<br><br>PC2.1 'Identify propagation material to be used and confirm quantities with supervisor' added. PC1.3 'Collect required tools, equipment and materials for the task' extended to include, 'and check for functionality'.<br><br>Sanitation covered in PC1.5 and in PE and KE.<br><br>Content regarding tissue culture has been retained in this unit as one of the propagation methods used in industry. The qualification includes a number of imported elective units to further expand the skills and knowledge required to support the tissue culture method.<br><br>PC1.4 Prepare media for the propagation process being undertaken according to supervisor instructions moved to PC2.2 to cover pre-wetting and draining of media prior to propagation process. Pre-wetting added to KE.Cutting techniques covered in KE<br><br>"Quality' added to PCs related to record keeping, e.g. "Maintain records according to workplace quality procedures"<br><br>Dot point in KE extended to 'climate requirements in controlled growing systems, including ideal target lighting intensity, temperature and humidity |

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| | file/cultivation tracking software. Comments added against Element 3, To add some value:<br><br>-Provide some understanding of ideal cuttings temperature/RH across 10-21-day propagation period depending on cultivar/grow media<br><br>-Re-wetting technique focussing on average propagation tray water content estimated via weighing<br><br>- mention of cuttings destruction in-line with procedures<br><br>-Target lighting intensity should be discussed here. Comments added against Element 4, Not sure if this is meant to be post-cuttings production or post-propagation period - reads like the former, but unusually positioned in document. Comment made against 'tissue culture in PE, Again, challenging one to include here. I'd stick to cuttings/seed as this is another whole area of its own. Comments added to KE, Common thing to observe/escalate to manager:<br><br>- Failed cuttings, e.g. dampening-off<br><br>- Necrotic tips/leaf material<br><br>- Mould on propagation cube or cutting<br><br>- Signs of water stress<br><br>- Signs of nutrient deficiencies<br><br>- Pests/disease<br><br>- Humidity stress<br><br>- Temperature stress. | levels for propagation method and growing media' to cover ideal temperature during propagation period.<br><br>PC3.3 'Assist with monitoring water and nutrient requirements' extended to include, 'applying re-wetting techniques as required'.<br><br>PC 4.3 'Report and record completion of disposal and destruction activities' add to cover recording and reporting of destruction activities. Element 4 has been expanded to "Clean up after propagation and monitoring activities' for clarity. |
| RTO Victoria | Combine 1.3 and 1.7 Collect and have ready …..Maybe rework 1.7 to say something about preparing the tools, equipment and materials for entry into secured area??<br><br>In Knowledge Evidence, if you are referring to the external features of a plant the word 'Morphology' may be a better choice here. Also, there is nothing in the PCs to way that there is a need to identify the external features of a plant. | Feedback adopted.<br><br>PC1.7 amended to read "Check propagation work area is clean and free of waste on entering secured area.".<br><br>"Anatomy" in KE replaced with "plant morphology" and PC added 'Identify and inspect propagation material to be used and confirm weight and quantities with supervisor' as 2.1. |

| AHCMDC203 Assist with care and maintenance of medicinal cannabis | | |
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| Industry Employer NAT | General comments regarding the PCs, it isn't clear what this section is trying to illustrate. Are these the key competencies that will need to be demonstrated at the completion of the unit? The scope of this section needs to be in line with tasks outlined in the Knowledge Evidence. I would break up the sections. At the moment dot point 1 is very brief and steps 2 and 3 are the majority of your course content. e.g. Step 1 Preparing equipment and room for cultivation task (this would include verifying that all equipment is clean and satisfactory for use, performing line clearances where applicable i.e. the room is clear of waste before moving plants to a room. 2. Trimming and training plants. 3 Transplanting/repotting 4 Fertigation requirements and nutrient solutions. 4 Plant abnormalities/nutrient/pest/disease symptoms. PC2.3 replace "that minimises dust on leaves' with "using various growing media (soil, rockwool, coco-coir, etc). Include 'Ability to identify common cannabis pests/diseases' in Performance evidence. Comment made against Knowledge Evidence include: Each dot-point below will have different training depending on the cultivation method being used at the facility, for example, coco-coir rockwool, soil etc. This should include common nutrient deficiencies/ excesses and common plat symptoms caused by environmental stress, such as heat stress, overwatering, underwatering etc, Identification of common pests and diseases and treatment of these in accordance with Integrated Pest Management strategy. | Feedback considered and mostly adopted.<br><br>The elements are the key functions associated with the outcomes unit of competency outcomes and must have a clear link between the performance criteria associated with it. They also have links between the performance and knowledge evidence. Tasks associated with step 1 are covered in Element 1. "Check for functionality' (tools and equipment) added to PC1.3. PC1.6 amended to read "Check cultivation work area is clean and free of waste on entering secured areas" to cover line clearances. Steps 2 and 3 covered in Element 2. Fertigation and nutrient requirements covered in Element 2 following maintenance and Element 3 in monitoring and the care of plant health. PC2.3 which is now 2.4 amended to read, "Assist with repotting tasks, using required techniques for growing media used".<br><br>Dot point, "identified common plant health issues and signs of disease and pests" added to Performance Evidence. In Knowledge Evidence, "sighs of disease and pests' expanded to read "signs of common plant health issues, including nutrient deficiencies or excesses, environmental stress such as water, temperature and humidity stress, mould". The suggestion of "Identification of common pests and diseases and treatment of these in accordance with Integrated Pest Management strategy " amended to "common pests and diseases" to keep it generic and flexible in meeting the differing needs of organisations and industry. |
| RTO Victoria | Combine PC 1.3 and 1.6 Collect and have ready ….<br><br>Element 3 Very similar to element 3 in 202. I guess that is deliberate.<br><br>In reference to dot point 're-potted and safely transferred at least six plants' in Performance Evidence, is this a repeat or is this 6x6?<br><br>In Knowledge Evidence, Same comment as for MDC202. Plant morphology is generally used for the structure | Feedback adopted.<br><br>PC1.6 has been amended to read "Check cultivation work area is clean and free of waste on entering secured area.".<br><br>Element 3 is similar to Element 3 AHCMDC202 as the monitoring of propagation material and plants are based on similar performance.<br><br>Performance Evidence amended to 'assisting with propagation tasks over at least two propagation cycles' rather than specifying number of plants. |

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| | features of plants. Also, the PCs do not specify the need to identify the external features of a plant. | "Anatomy" in KE replaced with "plant morphology" and PC added '2.1 Identify and inspect medicinal plants to be maintained and confirm weight and quantities with supervisor". |
| **AHCMDC204 Assist with harvest and pre-processing of medicinal cannabis** | | |
| RTO Victoria | Combine PC 1.3 and 1.6 Collect and have ready …..1.6 Check tools, equipment and materials prior to entry? In 2.3, Perhaps they should be identifying the flowering stems first? 2.1 Check plant health prior to commencing harvesting tasks, including signs of disease or pests and report abnormalities or presence of disease or pests<br><br>Need to have an understanding of plant anatomy to do this but to what degree. Not mentioned in PC should there be another PC i.e. identify MDC anatomical features and characteristics. Have commented for 202 and 203. Individuals carrying out these tasks should be able to identify the external structural (morphological) features of the plants. The only feature mentioned in the PCs are plant stems. For these level II units there should be more information about the level of knowledge i.e. Stem, leaf, root, bud, flower, inflorescence, petiole, stipule, node, internode etc. and terms axillary and apical. Probably don't need much more than the basic external structural features of a plant. | Feedback adopted.<br><br>PC1.6 has been amended to read "Check cultivation work area is clean and free of waste on entering secured area.". PC added as PC2.1 to read, 'Identify and inspect medicinal plants to be harvested, including flowering stems to be cut, and confirm quantity and weights with supervisor' and "plant anatomy" amended to 'plant morphology' in KE for clarity about degree of understanding required. |
| **AHCMDC301 Apply regulatory and quality requirements to the production of medicinal cannabis** | | |
| Industry Employer SA | I have attached the reviewed document.<br><br>Technicians and QA staff will need to know how to sample correctly.<br><br>Technicians would be doing the majority of the sampling (ideally), but some businesses may insist on QA staff doing it.<br><br>PC 1.4 Remove 'requirements' after licensing. PC 2.4 HAACP is a system used for food safety. It doesn't really apply for this industry. We use the principles of GMP, | Feedback adopted.<br><br>Removed 'requirements' after 'licensing' in PC1.4.<br><br>Removed PC2.4 and reference to HAACP in unit content. PC3.1 reworded to read, "Record details of cannabis material receipted at site, stored on site and supplied from the site" for clarity.<br><br>The term "numeral' has been replaced with 'numerical' in Foundation Skills, and in other units where 'numeral' appeared.<br><br>In PE, evidence of completing records is required on at least 3 occasions. The term 'testing' has been replaced with 'sampling'. |

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| | including Risk Analysis, to identify and mitigate potential risks to the product<br><br>PC 3.1 'Record details of planting material supply into and on site, out of production and off site' Not sure I follow what this means. Is it referring to recording inventory details and movements?<br><br>In Foundation Skills, remove 'including HACCP. Replace "numeral' with 'numerical'<br><br>In Performance Evidence, re: completing records, Is once adequate?<br><br>I would ordinarily expect to observe a trainee complete a task multiple times (at least 3) before considering them competent'. Remove or replace 'testing' with 'sampling' (also in Knowledge Evidence) | |
| RTO Victoria | E1 and PCs are identify and then PC moves into review<br><br>Review usually level 5 and moving from identify to review misses few steps. May another E on assessing compliance of documents. Identify non-compliant workplace procedures.<br><br>Next Element<br><br>Ensure workplace procedures meet regulatory requirements.<br><br>PC around assessing and updating documents as per application. Element 2 Follow not consistent with language in PCs identify, implement monitor??? | Feedback adopted.<br><br>Element 1 revised and split into two elements. Element 1 covers the identification of regulatory requirement and Element 2, the application of regulatory requirements.<br><br>Compliance of documents is covered in Element 4. PCs 2.3 and 4.7 added regarding the reporting instances of non-compliance and deviations. |
| Industry Employer Victoria | This unit provides a good overview.<br><br>Add as 1.6 Identify the quality requirements for medicinal cannabis produced. Amend 3.1 Record details of cannabis material receipted at the site and stored on site, produced on site and supplied from the site. In Knowledge Evidence, add "and an awareness of the standard for medicinal cannabis (Therapeutic Goods Order No. 93) | Feedback adopted.<br><br>Quality requirements covered in Element 3. PC3.1, now 4.1 amended to read, "Record details of cannabis material receipted at site, stored on site and supplied from the site into and on site, out of production and off site." Reference to the 'standard for medical cannabis' now covered in PC1.1. 'Identify legislation, regulations and standards relevant to the production of medicinal cannabis' and as dot point 'national, state and territory legislation, regulations and standards relevant to the production of medicinal cannabis' in Knowledge Evidence. |

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| **AHCMDC302 Undertake propagation of medicinal cannabis** | | |
| RTO Victoria | PC2.1 Would you need to be able to identify source/select plant material for propagation first? | Feedback adopted.<br><br>PC2.1 amended to read .1 Identify, check and record type of, quantity and weight of propagation material to be used against specifications" This adjustment also covers inventory management requirements. |
| **AHCMDC303 Undertake care and maintenance of medicinal cannabis** | | |
| RTO Victoria | Knowledge evidence - In order to trim and shape plants you would need to identify external plant features. Also be able to identify disease/plant health issues. | Feedback adopted.<br><br>'Plant morphology', 'signs of common plant health issues, including nutrient deficiencies or excesses, environmental stress such as water, temperature and humidity stress, mould, and their remedies' and 'signs of common disease and pests, and their control' added to Knowledge Evidence. Also added to AHCMDC302 and AHCMDC304. |
| Industry NAT | Replace 'growing' with 'vegetative' throughout unit. Replace 'growing systems'' with 'cultivation environments' throughout unit. Suggest minor changes to PCs to read 2.4 Use tools and equipment safely and cautiously throughout cultivation environments.<br><br>2.5 Repot and transfer plants between vegetative and flowering areas using safe practices<br><br>2.6 Check water and nutrient requirements after pruning and potting and use environmental control systems to adjust and maintain to the required environment. Add ', and nutrient excess or deficiencies' to 3.2.<br><br>In Performance Evidence, evidence gathered for at least one vegetative and flowering cycle. This may be insufficient as one vegetative and flowering cycle would mean the individual will have only completed tasks once, as the vegetative and flowering care can be significantly different. If 6 plants are maintained over multiple crops this will give the individual a better understanding of how the plants grow back between maintenance events. Particularly important for mother plants, that we prune fortnightly. The individual will be able to assess how their previous pruning has | Feedback adopted.<br><br>Advice sought from SMEs. Reference to 'growing' replaced with 'vegetative' throughout unit.<br><br>PC2.5 amended to read "Use tools and equipment safely and cautiously around cultivation environment'.<br><br>"Nutrient excess or deficiencies' covered in KE along with issues affecting plant health.<br><br>Heading statement in PE amended to "There must be evidence that the individual has undertaken the care and maintenance of at least six medicinal cannabis plants on at least two occasions for each of the vegetative and flowing cycles". |

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| | affected the growth of the mother plant and how these effects repeat pruning events. | |
| **AHCMDC304 Undertake harvest and pre-processing of medicinal cannabis** | | |
| Industry Employer/RTO | (AHCMDC304 PC 2.3 ‘may be a number of different ways’. Cutting down the plant at the base is quite a basic exercise but post cut-down more procedures are involved (each company is different).<br><br>Plants only bloom once  fan leaves may also have cannoboids.<br><br>For assessment requirement refer to number of plants e.g. ‘harvest 5 plants’.<br><br>For harvesting tomato’s it specifies to harvest ‘a row’ for assessment which is about 50 plants.<br><br>For MC better to specify ‘3 different crops’.<br><br>For MC, harvesting will occur ‘according to production schedules. Learners won’t be making a judgement about when to harvest. | Feedback considered and mostly dopted.<br><br>PCs 2.3 'Cut flowering stems and place in harvest containers according to specifications and workplace procedures' has been written broadly to accommodate different organisational procedures.<br><br>Main tasks of Performance Evidence amended to read "There must be evidence that the individual has undertaken harvesting and pre-processing operations for medicinal cannabis for at least six medicinal plants on at least one occasion.".<br><br>Dot point in Performance Evidence regarding 'making a judgement about when to harvest' amended to 'checked plants for signs of health issues, disease and pests prior to harvest'. |
| RTO Victoria | Does this include health and check for disease?? Maybe the plant health/diseased material check should be pre-harvest. In Assessment Conditions - Where is knowledge component of this, can be in specs and plans but not explicit. The PCs mention checking with the supervisor pre-harvest but not identifying plants ready for harvest. | Feedback adopted.<br><br>PC2.2 'Check plant health prior to commencing harvesting tasks, including any signs of disease or pests and report abnormalities or presence of disease or pests" added as a performance before harvest. Dot point in Assessment Conditions amended from 'plants ready for harvest' to 'plants for harvesting. Reference to 'making a judgement about when to harvest' removed from PC and Performance Evidence. |
| Industry Employer NAT | In Application Statement, keep in mind - this whole process with need to be in-line with Good Manufacturing Practices (GMP) under a TGA license for medicinal flower product. Oil extract is an exception due to downstream manufacturing steps (and inherent bioburden reduction).<br><br>Comments against PCs include 2.1 Inspection of crop for signs of boytritis, and escalation to manager. 2.2 Bit late for this one - this is more importantly done throughout the | Feedback adopted.<br><br>Principles of Good Manufacturing Practices (GMP) in relation to pre-processing of medicinal cannabis is included Knowledge Evidence.PC2.1 and 2.2 rewritten and ordered to read, ' 2.1 Check and record weights and quantities of plants to be harvested against specifications.2.2 Check plant health prior to commencing harvesting tasks, including any signs of disease or pests and report abnormalities or presence of disease or pests.' PC.2.3 'Cut flowering stems and place in harvest containers |

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| | cultivation period via glasshouse environmental control system, e.g. PRIVA. 2.3 Clearly many ways to undertake a commercial harvest - most common "wet-trimming" process:<br>• Plant cut-down in flowering room (crop-support netting removed)<br>• Plants cut-down into individual branches in preparation for "de-stemming"<br>• Plants transferred to rendering/trim-room via lined tote/tub<br>• Fan leaves removed using hands or secateurs if sugar-leaf trim is to be utilised for extract<br>• Plants de-stemmed using de-stemming machinery<br>• Plants trimmed using mechanical trimmer<br>• Transferred to drying room trays and moved to drying room.<br>2.4 Extremely important to minimise handling of flower to avoid removing resin and contributing to bioburden 3.4 and 3.5 This isn't a very commercial process - difficult to trim stems manually, hence de-stemming above so that a mechanical trimmer can be used. If hang drying in preparation for extraction, no leaf removal can take place. Simply de-stem dry flower/leaf/stems using appropriate equipment (e.g. Munch Machine/B4 Bucker/Cannabucker).<br>Comment made against Performance Evidence "assessed harvest time based on visual and physical signs and/or testing" Most commercial sites this will be defined by the production schedule, not when the flower is deemed ready by a lead grower. Optimum harvest time will generally be determined in R&D setting. Comment made against "climate conditions" Downstream harvest conditions most relevant here (RH/Temperature/air changes per hour). | according to specifications and workplace procedures' written broadly to accommodate differing organisational procedures.<br>PC2.4 reworded to include reference to 'flower".<br>PC3.5 amended to read 'De-stem flower using required equipment according to specifications and safe practices'.<br>Dot point in Performance Evidence amended to 'checked plants for signs of health issues, disease and pests prior to harvest'. |
| **AHCMDC401 Apply security measures for medicinal cannabis** | | |
| Industry Employer NAT | Add 3.3 Perform routine stocktakes and maintain records 3.4 Maintain hard copy and electronic records. Add In-line with workplace procedures and regulatory requirements/to 4.3. | Feedback Adopted.<br>PC3.1 rewritten as "Monitor records of supply and traceability of cannabis to ensure that they are completed and maintained according to workplace and regulatory requirements" to incorporate the intent of the feedback (i.e. |

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| | | performing stocktakes and maintaining hard copy and electronic records). "Conducted an assessment' also added to 'on the maintenance of records and surveillance data' in Performance Evidence "According to workplace and regulatory requirements' added to PC4.3. |
| RTO Victoria | Unit Reviewed and no comments | No change required. |
| **AHCMDC402 Monitor medicinal cannabis production for compliance and quality** | | |
| RTO Victoria | Element 2 PCs cover first part of risk assessment similar to HACCP approach but no mention of limits, measures and corrective actions. Usually part of this process.<br><br>In Performance Evidence, no mention of control limits or measures and corrective actions just establish point. Is this based on a HACCP approach? Regarding dot point 'process for conducting risk and hazards identification and developing control measures' in Knowledge Evidence, not in PCs, only limits. | Feedback adopted.<br><br>PCs 2.2 and 2.3 extend to include reference to control limits, measures and corrective actions. Also added to Performance Evidence and Knowledge Evidence. |
| **AHCMDC403 Plan and implement a propagation program for medicinal cannabis** | | |
| RTO Victoria | PC2.6 add Control limits, measures and corrective actions In Performance Evidence add 'add corrective actions' after control measures.<br><br>In Knowledge Evidence, GACP is in a few units. Are guidelines developed by the World Health Organisation? Are there Australian guidelines similar to this? Add Principles of risk assessment hazard identification, risk analysis, control limits, measures and corrective actions and evaluation. | Feedback adopted.<br><br>PC2.6 extended to include "control limits, measures and corrective actions'. GACP/GMP are requirements for Australian Office of Drug Control licence holders<br><br>Dot point "Principles of risk assessment hazard identification, risk analysis, control limits, measures and corrective actions and evaluation". |
| **AHCMDC404 Plan and implement a care and maintenance program for medicinal cannabis** | | |
| RTO Victoria | PC2.6 add Control limits, measures and corrective actions.<br><br>Wrong code in Assessment Requirements title.<br><br>in KE, Add another KE on principles of risk assessment. | Feedback adopted.<br><br>PC2.6 extended to include "control limits, measures and corrective actions'. |

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| | | Wrong code in AR title corrected.<br><br>Dot point "Principles of risk assessment hazard identification, risk analysis, control limits, measures and corrective actions and evaluation" added to KE. |
| Industry Employer NAT | General comments made include:<br><br>This role requires a detailed understanding of cannabis cultivation and the labour requirements for each step of the cultivation process.<br><br>Cultivation methods may be specific to each site depending on company IP. Maintenance plan sounds like is the cultivation plan from start to finish? A few additional items that are important for this role may include:<br><br>• Provide training to cultivation staff<br>• Addressing any errors through a written report (deviation investigation).<br>• Costing of raw materials/labour for a crop/plant.<br>• Strong attention to detail and record keeping skills. | Feedback adopted.<br><br>Skills and knowledge cover cultivation and labour requirements. Maintenance plan is relevant to care and maintenance requirements. PC 3.2 now reads "Communicate and provide training on workplace procedures and schedules, including health and safety, hygiene and security requirements for care and maintenance activities" to cover staff training. PC4.4 expanded to read 'Complete reports on care and maintenance activities to meet workplace and compliance requirements, including deviation investigations as required' to address diviation reports and record keeping skills. Costing of resources covered in Foundation Skills. Feedback from this unit also addressed AHCMDC404 and AHCMDC405. |
| **AHCMDC405 Plan and implement a harvest and pre-processing program for medicinal cannabis** | | |
| RTO Victoria | PC2.6 add Control limits, measures and corrective actions.<br><br>Wrong code in Assessment Requirements title. In Performance Evidence ad corrective actions.<br><br>in KE, Add another KE on principles of risk assessment. Good Manufacturing Practice for Medicine? Is there a licencing or certification needed for the pre-processing stage? | Feedback adopted.<br><br>PC2.6 extended to include "control limits, measures and corrective actions'. GACP/GMP are requirements for Australian Office of Drug Control licence holders. Dot point "Principles of risk assessment hazard identification, risk analysis, control limits, measures and corrective actions and evaluation" added to KE. GMP is a regulatory requirement for pre-processing stage. |
| **Units General Feedback (across all 13 units)** | | |
| Industry Employer SA | How much is covered regarding the processing side? (units cover some aspects of 'pre-processing' only).<br><br>Good level of detail and understanding of the growing process described in the units of competency. | No change required. Supportive of growing and harvesting units. |

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| Industry Employer NAT | I had a read though several of these today and one of the big things that stand out is there is no real emphasis on inventory management, most of the steps are in place for the cultivation and harvest units, but I feel Inventory should be a clear first step in most of these procedures as ensuring all the plant counts and weights should match up after a process to ensure there is no diverson.<br><br>Inventory management and documentation of all actions and material used really needs to be emphasized. This is the basis to defend companies from a potential recall, or protect a company from division.<br><br>Being in the industry for several years now, and also coming from traditional horticulture, the major learning curve was ensuring everything was documented, validated and accounted for.<br><br>Aside from that, they look pretty good. | Feedback adopted.<br><br>Emphasis on inventory management has been addressed in all growing and harvesting units. Skills relating to conducting and recording plant counts and weighs and reporting any deviations from counts and weights addressed in PCs, PE and KE fields. |
| Industry Employer Victoria | The content looks fine from a Quality stand point. At a high level the content seems fine. There will be additional site training that will be provided (unless you want it to be included in this course) regarding Good Documentation Practices (refer to SOP 40) etc and ALCOA principals that will need to be detailed that highlights the importance of data integrity and accurate recording of information that is honest and that can withstand the test of time.<br><br>As always I would suggest that it flows back to the mandatory requirements regarding responsibilities as outlined in PIC/s as this ultimately is the 'quality requirements'.<br><br>Responsibility for Production Activities<br><br>The responsibility for production activities should be described in writing, and should include but not necessarily be limited to:<br><br>1. Preparing, reviewing, approving and distributing the instructions for the production of intermediates or APIs according to written procedures; | All AHCMDC units adequately address quality requirements for recording and reporting. |

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| | 2. Producing APIs and, when appropriate, intermediates according to preapproved instructions;<br><br>3. Reviewing all production batch records and ensuring that these are completed and signed;<br><br>4. Making sure that all production deviations are reported and evaluated and that critical deviations are investigated and the conclusions are recorded;<br><br>5. Making sure that production facilities are clean and when appropriate disinfected;<br><br>6. Making sure that the necessary calibrations are performed and records kept;<br><br>7. Making sure that the premises and equipment are maintained and records kept;<br><br>8. Making sure that validation protocols and reports are reviewed and approved;<br><br>9. Evaluating proposed changes in product, process or equipment; and<br><br>10. Making sure that new and, when appropriate, modified facilities and equipment are qualified.<br><br>May also want to cover the responsibilities specifically for people handling and managing cannabis. | |
| Industry Employer NAT | A couple of items come to mind so far that includes:<br><br>Reference to GMP in greenhouse production that maybe should be GAP?the extreme cost to produce product under GMP (e.g. high and costly food grade production and control technology in the greenhouse) would quickly make it unviable and general view is that GMP starts after harvesting. (however people should follow GMP in hygiene, clothes, etc)<br><br>I note the following general statement in a number of units:<br><br>3.3 Check climate control, including temperature, lighting and humidity levels according to specification and adjust as required | Feedback adopted.<br><br>Emphasis on inventory management has been addressed in all growing and harvesting units. Skills relating to conducting and recording plant counts and weighs and reporting any deviations from counts and weights addressed in PCs, PE and KE fields. |

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|---|---|---|
| | CO2 (carbon dioxide) is as important to photosynthesis (growth) as water, temp, light, etc and should be included as these targets change as the others change (n.b. it is often missed in propagation that when using lighting, you must use CO2 otherwise a poorer quality and slower developing seedling!) | |

## Summary of Feedback on Draft Skill Sets

| **Stakeholder Comments and Identified Issues** | | **Consideration and Proposed Resolution** |
|---|---|---|
| RTO QLD | Proposed skill sets – 'would be great for someone doing Cert III in Ag' | No change required. Supportive of proposed skill sets. |
| Industry Employer /RTO Victoria | This skill set very useful and applicable for entrants to the industry (Induction to Work in the Medicinal Cannabis Industry Skill Set) | No change required. Supportive of proposed skill set. |
| Industry Association (WA) | Induction to Work in the Medicinal Cannabis Industry Skill Set<br>Are these 2 units really necessary? Combine into one! | Feedback considered and referred to wider SME group. Advice provided included:<br>The two units address different areas of regulatory requirements - AHCMDC201 for the physical security of medicinal cannabis and AHCMDC301 for the production and quality of medicinal cannabis. |
| Industry Association (WA) | Induction to Work in the Medicinal Cannabis Industry Skill Set.<br>Perhaps 'Introduction'?<br>If you use 'induction' state governments will be reluctant to fund it as induction is an employer responsibility. | No change required. There are currently 16 skill sets on TGA that include the word "induction" in their title. |