Food & Beverage Processing project

Summary of Feedback, Responses and Actions – Drafts Available Public Consultation 1

June 2020

Draft qualifications, units of competency and skill sets for the Food & Beverage Processing project were made available on the Skills Impact website for stakeholder review from 4 February to 29 March (this period extended to allow more time for stakeholder affected by fires, floods and COVID-19). Please visit the website to view a full list of the documents that were submitted for consultation during these phases.

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

	ACT	NSW	NT	Qld	SA	Tas	Vic	WA	National
Industry (employer / employee)		■		■	■	■		■	
Industry association (includes feedback from Industry Advisory Bodies)				■	■				*
Union							■		■
Registered Training Organisation (RTO)		■		■	■	■	■	■	
Government department									■

Note: two organisations have been included in the "Industry Association" category for the purposes of this report, but it should be noted these organisations are classified as Health Peak Advisory Bodies.
General note: Feedback received from a national industry association and an Industry Training Advisory Body, as well as research undertaken by the project team, indicates no relevant stakeholders in the Northern Territory and Australian Capital Territory.

Feedback received during the 'drafts available public consultation 1' period for the qualifications, units of competency and skill sets that have been developed for Food & Beverage processing project has been positive, with multiple changes and updates suggested by stakeholders to help meet the needs the broad range of job roles covered by these qualifications. Some of the suggested changes require additional consultation. As such a second 'drafts available public consultation phase' will take place for 4 weeks during June and July. For a full breakdown of the documents available for feedback during this additional phase, please visit the Skills Impact website for copies of the draft documents along with supporting documentation and video to inform these changes.

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

Acronyms - PC – Performance Criteria, PE – Performance Evidence, KE – Knowledge Evidence, AC – Assessment Conditions, SMEs – Subject Matter Experts, CVIG – Companion Volume Implementation Guide, FBP – Food, Beverage and Pharmaceutical

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1. Summary of feedback on draft qualifications

Certificate I in Food Processing

During 'Drafts Available Public Consultation 1' the *Certificate I in Food Processing* was proposed for deletion due to low and declining enrolments. It was suggested that the required skills could be covered by the *FSK Foundation Skills Training Package* qualification *Certificate I in Access to Vocational Pathways* with Food Processing-specific electives.

As shown in the tables below, there was general support for this approach from many stakeholders. However, feedback also revealed a direct link between the Certificate I in Food Processing and food processing industry awards and Enterprise Bargaining Agreements. Deleting the qualification would cause disruption to these agreements. In addition, delivery options for FSK qualifications are limited in some states making the alternative delivery option not viable.

As such, the current *Certificate I in Food Processing* qualification has been reviewed and updated, with a food safety unit added to the core to ensure it fits with a Food Processing role/ environment, and to provide pathways to higher level food-related qualifications. A draft of the proposed new qualification is now available for review and feedback on the Skills Impact website.

Comments related to suitability of Certificate I in Food Processing

Stakeholder Comments	
Industry Association - Qld	It is noted that there is no Certificate I in Food Processing and that it is suggested that FSK10119 Certificate 1 in Access to Vocational Pathways be use in place of a Certificate I in Food. It is unlikely that FSK will be taken up by VET in schools in Queensland as the minimum VET courses for secondary students are trending to Certificate II level.
	Don't believe people are set on using current Cert I. Industry doesn't generally value Certificate I level - lowest level is a traineeship. QLD not interested in funding Cert I in general. Don't see an issue with deleting Certificate I and using FSK qualification instead.
RTO – Vic	Please take into consideration the following; [Our RTO] is currently delivering the qualification at 2 [company name] sites in Victoria. This qualification is used in line with the new starters induction program and it gives them a great understanding of the safety aspects in working in the food industry. We have been delivering this qualification for many years in this manner and it has worked and a great introduction to a certificate II. We must remember that some of these workers have not studied for years and that it might be challenging to place them in higher qualification.
RTO – Vic	I note that there were 3,489 enrolments in this qualification (and the predecessors) from 2015 to 2018. Should it be deleted? Will the suggested alternative *FSK10119 Certificate I in Access to Vocational Pathways* be attractive to potential or existing employees and

Stakeholder Comments	
	/ or employers, will it be used appropriately for the food sector (i.e. selection of relevant electives) and not misused by the delivery of 'easy / lost delivery cost' electives?
RTO – SA	Support the deletion of Certificate I. However need to keep in mind that FSK Foundation Skills Training Package qualifications are not allowed to be delivered to school students as VETiS. Also funding in SA is not available for FSK qualifications to people who are eligible to do adult educations programs instead (for example). Some of these restrictions would prevent people from being able to deliver FSK.
RTO - NSW	Although we don't deliver it, I'd support the proposal to delete Certificate I and use FSK qualification instead.
Industry Association - National	Yes ok to remove
Industry – National	[Organisation] use it as a pathway to Cert II. General view that Cert I deals with induction type skills – not bothered if it's not there, but need to make sure the pathway to Cert II is still there.
RTO - Vic	[Organisation] has delivered Cert I in the past and used on a fee-for-service kind of idea for employers, but haven't done for awhile. Not putting anything new on scope, are fine with working with whatever happens with Cert I. Could have pre-employment skill set for Food (food safety, communicate, read instructions, WHS) would be beneficial (that is funded)?
Industry – Tas	Agree with proposed Cert I changes
RTO – Vic	Agree with removing Certificate I

Stakeholder Comments	
Union - National	Some concerns around the pathways by deleting Cert I. Would still like to keep it. Concerned that, even though a lot of places may have the induction skills training in house that's great, if that goes away and there's no Cert I, what happens?
RTO – NSW	No we don't [deliver the Certificate I] but I really like the idea of FSK instead
RTO – NSW	Support the deletion of the Cert I Food Processing qualification & support the suggested replacement option
Union - National	The Certificate I in Food Processing aligns with Food award level 3, which is the minimum requirement of an AQF Certificate I in food processing or equivalent. The Certificate I is explicitly listed against the EBA. The Certificate I should not be deleted
Union – National	Background Although the [Union] is not a provider of food and beverage qualification training, the proposed changes can impact our members and workplaces. The Food, Beverage and Tobacco Manufacturing Award 2010 (the Award) is assisted by the AQF standards when determining classification structures and pay rates under the Award. In turn, this also impacts Enterprise Agreements which exist in the industry. AQF and the Award Anecdotally, a significant number of employers in the food and beverage industry do not train workers with formal qualifications or frameworks. Instead, many employers maintain that they employ an 'unskilled' workforce. As a result, workers are not given the opportunity to obtain qualifications and progress through classifications under the Award or relevant Enterprise Agreements. Site A - Food Manufacturing The Enterprise Agreement at Site A includes more levels of classification than what is provided for in the Award. The classifications are vague and can make it difficult when reviewing levels of employees. Site A has recently announced its closure. A state government regional retraining initiative contacted Site A and subsequently provided visits from TAFE officials. Workers at Site A were given qualifications for recognition of prior learning. Site B - Food Manufacturing

Stakeholder Comments
Site B is an applicant for a proposed Enterprise Agreement with one classification and a mentor allowance. Workers at Site B are not given the opportunity to obtain qualifications, despite doing work that would amount to a higher classification and a 'skilled' task. General view Food and beverage workers are skilled workers. Workers in this essential industry should be given the opportunity to obtain qualifications and progress through classifications in the course of their employment. It is the general view of the [Union] that classifications should not be simplified any further. Classifications should be based on length of service, skill set and responsibility, with applicable allowances. Qualification consolidation for the purposes of low enrolment rates are reasonable. However, when reviewing qualifications against the AQF, any adjustment should be seriously considered with regard to the effect it may have on the Award.

Certificate II in Food Processing

Comments related to Core Units (including suggested additional core units)

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO - Vic	RE: Suggested additional core unit "Work effectively in the food processing industry" Move to group A	Unit moved to Group A electives
RTO - Vic	RE: Inclusion of "FBPBPG1XX1 Pack or unpack product manually" in Group B move to group A as this is a key issue in industry - majority of OHS incidents	Unit is an AQF1 unit and in line with the redesigned structure remains in Group B. The groups cluster units aligned to different AQF levels - they are not ranked by their importance.
RTO - Vic	RE: Suggested additional core units Not appropriate for core units	Units suggested as possible core units in Draft 1 have been moved to electives.
RTO - Qld	RE: Suggested additional core units These last two core are not needed it is better to have more group A electives	Units suggested as possible core units in Draft 1 have been moved to electives.
RTO - Vic	RE: Suggested additional core unit " Participate in work teams and groups" should NOT be added to core units	Unit not added to core - has been added to elective bank.
Industry association – Qld	The core units should include FBPPPL2001 Participate in work teams and groups because companies are expressing the importance of team work and their people. Therefore increase the number of core units to 5 and 8 electives and change electives to "up to 3 units from any current endorsed training package …" "Work effectively in food processing" should not be in the core, but "work teams" should be in the core.	Most stakeholders would like to see *FBPPPL2001 Participate in work teams and groups* included as an elective, so this will be available as an elective unit and the number of core units unchanged. Flexibility rule updated to 'up to 3 other units from any endorsed training package, etc'. "Work effectively in the food processing industry" has been added to the Group A electives.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – SA	RE: Suggested additional core units Would not add the other 2 units. We have small niche providers - teams and groups are not the right fit for micro-processors. The core units listed already are suitable, but the other 2 should be electives	Suggested additional core units have been added to the elective bank.
Industry – Tas	RE: Suggested additional core units No to FBPOPR2001X as a core unit - people would have to know this basically before they go in	Noted - included as an elective.
RTO – Vic	RE: Suggested additional core units We have used "work effectively" unit in the past. We have also used the work teams unit. Just because they pick the units doesn't mean everyone should. So could be ok in electives? Probably popular electives, but not necessarily core	Units added to elective bank.

Comments related to Elective Units

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO - Vic	RE: Inclusion of "FBPOPR1010 Carry out manual handling tasks" in Group B move to group A as this is a key issue in industry - majority of OHS incidents	Unit has been recoded to reflect AQF2 and moved to Group A
RTO - Qld	RE: Group A Electives Add MSL973001 Perform basic tests	Unit added to Group A electives.
RTO – Tas and RTO – Vic	RE: Group A Electives Missing OPR2057 operate a membrane process - not in Cert III either	*FBOOP2057 Operate a membrane process* has been merged with *FBPOPR2037X Operate a filtration process* to create *FBPOPR3X12 Operate and monitor a filtration process*

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Tas and RTO – Vic	RE: Group A Electives Missing FBPOPR2028 Operate a mixing or blending process. Stay at Cert II, not go to Cert III	Unit added to elective bank of the qualification and remains at an AQF level 2.
RTO – Qld	where have the sugar units gone to? Not sugar milling (different) Would be good to put in there We use this Cert II in VETiS so need to make sure sugar covered	The aim is to not cover content/work roles that are covered by the Certificate II in Sugar Milling Support, or the Laboratory Operations qualifications. However, 'FBPSUG2024 Perform standard tests on cane samples' has been added to meet the requirements of the Sugar Industry Award (EBA).
RTO - Vic	"Carry out manual handling" should be in Group A – very important	The code of this unit has been updated to reflect AQF2 and unit added to Group A.

General comments related to the qualification

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO - NSW	A good idea to merge qualifications into one Level II Qualification	Great - thanks for the comment.
RTO - Vic	RE: Qualification Description Take out comment -This qualification does not cover meat, including poultry meat, or seafood	Sentence revised to ensure delivery covering meat, seafood and poultry meat processing can be addressed in the qualification, but stakeholders should also be aware that there are specialist qualifications and units in other training packages.
RTO - Tas	RE: Packaging Rules - imported units maximum of two units from Cert II up to four units can be from Cert III	Under the Standards for Training Packages 2012, not all units have an AQF identifier in the code, so this rule is outdated (although Skills Impact does include an AQF identifier in unit codes, and the concept works for Skills Impact units). But the elective must ensure the overall AQF alignment of the qualification (and this is noted in the packaging rules).

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	*Merging of FBP20117 Certificate II in Food Processing and FBP20317 Certificate II in Food Processing (Sales) Enrolments in the 'sales' qualification are much, much lower than in general food processing qualification but still amounted to 370 from 2015 to 2018. Does this warrant a merger? This merger effectively involves the removal of 115 elective units that were available in FBP20317 Certificate II in Food Processing (Sales). 119 electives have been removed from FBP20117 Certificate II in Food Processing. Only four units may be brought back into the new merged qualification by import. Will the new qualification provide for all of the skills and knowledge required by all of the diverse food processing enterprises in operation across Australia?	The merge suits the needs of some stakeholders and none have objected. The number of elective units in the Certificate II have been reduced due to the AQF alignment of multiple units changing to AQF 3 to better reflect their outcomes. These units are now available in the Certificate III in Food Processing. Whilst the total number of elective units listed in the qualification has been reduced, the restrictions on which elective units could be selected that are in the current version of the qualification have been removed, making this updated version a bit more flexible than its current iteration. In addition, the number of units that can be imported from other training packages is slightly higher than the allowance in the current version of the qualification, again assisting with flexibility. Feedback from other stakeholders indicates the flexibility required for the broad coverage of the sectors in food processing is addressed in the proposed version of what qualification.
Industry association - Qld	Wording in Packaging Rules could do with some clarification so that requirements for number of units are clearer.	Packaging rules clarified in revised draft.
RTO – Vic	[Our organisation] uses the qual for meat and poultry – if the Cert II doesn't cover this, we may have trouble getting funding (or funding would be delayed) by using a different qual.	The wording in the Qualification Description has been updated to ensure it can be used for processing meat or poultry.
Industry – Tas	Want to specify what number of each level of unit could be imported from other TPs – want the specifics because it's a problem if there are too many Cert I. Doesn't help industry to have so many level 1 units	The packaging rules are written to exclude the choice of too many units at AQF2. Under the Standards for Training Packages 2012, not all units have an AQF identifier in the code, so this rule is outdated (although Skills Impact does include an AQF identifier in unit codes). The elective must ensure the overall AQF alignment of the qualification (and that is noted in the packaging rules).

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry – Tas	It's great that there's more flexibility in the electives – works well for [our] cohort. Doesn't want to see the number of importable units reduced	Great - thanks for the comment.

Certificate III in Food Processing

Comments related to Packaging Rules

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Tas	RE: Packaging Rules "at least 6 different units from Group A, B, C...." The number of units required may be an issue - eg in a large cheese processing plant which has a whey processing plant would get the four cheese units, whey operator would get evap, heat treatment and drying, (not batch powder) milk receival could get sampling and testing and separation	The 6 elective units for the general qualification can come from any specialist group, and for a general qualification this seems reasonable. For the dairy specialisation, additional units have been added, including *FBPOPR3X12 Operate and monitor a filtration process* has been added to the Dairy specialisation, as well as butter units.
RTO – Vic	RE: Packaging Rules "at least 6 different units from Group A, B, C...." agree with [the above comment] - we believe in many cases it will be difficult to get the specialisation due to the factory the operators works at docent have the breadth of processes available	
RTO – SA	RE: Packaging Rules - number of imported units The packaging rules should allow much more flexibility to import relevant elective units from currently endorsed training packages. Up to 5 units. For example, units from MSS Sustainability at AQF3 - 4 and units from the FSK Foundation Skills at ACSF 2 and 3	Packaging rules have been revised to allow up to 3 from Group L and 3 from anywhere. There are 5 MSS units listed as electives. Extra FSK units also listed under General Electives.
RTO – Vic	RE: Packaging Rules - number of imported units there is not enough flexibility in the package - we would like 4 or 5 units to be imported - this would provide for people working in the food industry in specialised support roles	
RTO – Vic	RE: Packaging Rules - number of imported units Agree with [both comments above] on the imported amount of units being increased	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – SA	Seems to be less listed imported units than before	Yes, trying to tidy up the AQF alignment of the qualification to ensure it sits at AQF3.

Comments related to Core Units

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	Recommendation that FBPFSY3XX1 Control contaminants and allergens in the workplace would be an elective rather than a core. Not all food processing plants have allergens they need to control and if we are only focusing on contaminants this will be addressed in the unit FBPFSY3001X Monitor the implementation of food safety and quality programs as it always has been.	Unit moved to elective bank.
RTO – Vic	Agree with the decision to merge the FBPOPR3005 / 3006 interrelated processes in a production / packaging process as the requirements are the same, it is just the focus on the assessment.	Unit remains in the core – agree that assessment strategies for the unit should be contextualised to suit the workplace requirements.
RTO – Vic	Do not agree that any of [the additionally proposed core units] are core but rightfully electives that can be applied and chosen as they suit each individual business. The moment they become core they are compulsory and will exclude some businesses when these units do not apply to them. Justification can be seen below: FBPFSY3002 – Many brewers do not have a HACCP plan as they do not have any CCP's. FBPOPR3003X – Great idea for a unit but will not be necessary or a desired choice for all business FBPOPR3X13 – A maintenance unit currently is available for training and we receive little to no interest because either their union agreements do not allow staff to perform maintenance or it	These units have been added to the elective bank.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
	is so minor it does not meet the unit requirements FBPPLL3004 – Not all companies allow people studying Certificate III to lead a group so the competence cannot be demonstrated.	
RTO – Vic	RE: Inclusion of "FBPFSY3001X Monitor the implementation of food safety and quality programs" in core should be a core	Unit remains in the core
RTO – SA	RE: Inclusion of "FBPFSY3XX2 Participate in traceability and recall activities" in core We have a number of client companies that have students that wouldn't require this unit (FBPFSY3XX2) as a core unit. It would be much better suited as a QUALITY elective unit	One of the drivers for this project is to ensure that skills and knowledge around traceability are covered, and industry representatives maintain a clear argument for this unit remaining in the core. The unit is not about having responsibility for traceability or recall activities but knowing what it is and how it relates to the operator role. Unit title has been updated.
RTO – Vic	RE: Inclusion of "FBPFSY3XX2 Participate in traceability and recall activities" in core Agree with [above] comment - this should not be a core unit	
RTO – Vic	RE: Inclusion of "FBPWHS3001X Contribute to work health and safety processes" in core should be core	Unit remains in the core
RTO – Vic	RE: Inclusion of "FBPOPR3XX5 Operate interrelated processes in a production or packaging system" in core Should be core	Unit remains in the core
RTO – Vic	RE: Inclusion of "FBPFSY3XX2 Participate in traceability and recall activities" in core Replace with FBPPHM2001 - Follow work procedures to maintain Good Manufacturing Practice requirements (see further notes at unit level)	A new GMP unit has been developed and added to the core. The traceability unit remains in the core on advice from industry representatives and SMEs.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	With regards to the comments on FBPPHM2001 - this unit is specifically written for the Pharmaceutical Industry, what has happened is Food Manufacturing businesses have adopted the GMP model within their facilities, however the FDF or FBP training package have not caught up. We urgently require a Cert 2 and Cert 3 Food based GMP unit	Two new GMP units have been developed and added to core of Certificate II and Certificate III.
RTO – Vic	RE: Core units Need 4 core - extra unit such as GMP for general food processing should be developed an added FBPFSY3001X FBPOPR3XX5 FBPWHS3001X	New unit developed to address GMP and added to core.
RTO – Vic	RE: Suggested additional core units None of these 5 should be core - they need to be added to general electives	Suggested units have been added to the elective bank.
RTO – Vic	RE: Suggested additional core units Agree that none of these units should be core	Suggested units have been added to the elective bank.
RTO – SA	RE: Suggested additional core units None of these 5 units should be Core units	Suggested units have been added to the elective bank.
RTO – Tas	RE: Core unit "FBPOPR3XX5 Operate interrelated processes in a production or packaging system" in line with the units becoming operate and monitor, this should be monitor interrelated processes - an overview of whole line involves monitoring I believe this should stay as a core unit - if you are not monitoring interrelated processes, then you are not processing food at Cert III	Title of unit updated to include 'and monitor', and remains in the core.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Tas	RE: Core units & suggested additional core units remove dietary, lead work teams and maintenance units add FBPOPR2069 Use numerical applications... as a core.	Suggested additional core units have been included as an electives instead. *FBPOPR2069 Use numerical applications in the workplace* also included as an elective and not a core as feedback from other stakeholders indicates this unit is not relevant to all.
RTO – Tas	RE: Suggested additional core unit "FBPOPR3X13 Plan, conduct and monitor equipment maintenance" not in the core - elective please	Unit included as an elective
RTO – Tas	RE: Suggested additional core unit "FBPPPL3004 Lead work teams and groups" lead work teams not attainable in small enterprises - or if your role is as a senior operator, but not a leader - should be an optional unit	Unit included as an elective
RTO – Tas	RE: Suggested additional core unit "FBPOPR3003X Identify cultural, religious and dietary considerations for food production" not relevant to all food processing - should be an elective (fish food not an issue...)	Unit included as an elective
RTO – Qld	If an additional core unit is required then can a unit that deals with calibration which will support the conduct and monitor equipment unit.	The number of core units (5) seems reasonable, so *MSL934004 Maintain and calibrate instruments and equipment* has been added to the elective bank. This unit may also be unsuitable for all workplaces and is also a higher-level task, so is best listed as an elective.
Industry Association – Qld	RE: Suggested additional core units Agree to leave 5 units as elective to allow for maximum choice and flexibility in the training plan ie add these to the general electives: FBPFSY3002, FBPOPR3003X, FBPOPR3X13, FBPPPL3004, FBPTEC3001.	Units included as electives
Industry Association – Qld	Change Group E from Oil Production to Edible Oil Production.	Title of specialisation updated

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – SA	The allergens unit is good in the core, support this. Have concerns with the traceability unit and what would be required. A lot of business would not have operators involved in recalls. Very directed and prescriptive process run by specialised people in the processes they work with. So would be concerned having it as a core, but good as an elective.	There has been little support for *FBPFSY3XX1* to be included in the core because of the overlap with *FBPFSY3001*, so moved to electives. The traceability unit remains in core and there has been support for this, particularly given it was one of the main drivers for the project. The content of the unit addresses knowing what traceability is and how it is addressed in the operator role - it's not about having responsibility for recalls, which would be the domain of specialists.
RTO – SA	RE: Suggested additional core units None of the suggested other units should be in the core - keep these as electives.	The suggested additional core units have been moved to electives.
RTO – SA	RE: Suggested additional core units Don't add the suggested additional units to the core - none work. Keep as electives.	The suggested additional core units have been moved to electives.
RTO – WA	RE: Suggested additional core units FSY3002 not suitable for core – not all workplaces have a HACCP team like having 4 core so there is more choice for people to make it work for the different workplaces. Every place is so different. Having more core would remove flexibility. Cultural/religious unit not suitable – not all places will make food in this space Need to keep this flexible!	The suggested additional core units have been moved to electives.
Industry & RTO & Industry Associations – SA	Cultural unit should not be in core HACCP team unit should not be in core – not everyone has a HACCP team	The suggested additional core units have been moved to electives.
RTO – Vic	Allergens unit would be covered in food safety unit, why have another in core? Don't think it should be in core. Traceability unit is covered in food safety unit as well.	The suggested additional core units have been moved to electives, along with *FBPFSY3XX1* (because of the overlap with *FBPFSY3001*). The traceability unit remains in core and there has been support for this, particularly given it was one of the main drivers for the project. The content

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
		of the unit addresses knowing what traceability is and how it is addressed in the operator role - it's not about having responsibility for recalls, which would be the domain of specialists.
RTO – Vic	RE: Suggested additional core units no to lead work teams and groups as a core unit. Raw materials yes could be ok HACCP team – no – put in quality control specialisation	The suggested additional core units have been moved to electives.
Industry – Tas	RE: Suggested additional core units Lead work teams and units – critical unit, but if it's going against the AQF 3 definition with "limited" responsibility, doesn't match. Don't put in core.	The suggested additional core units have been moved to electives.
RTO & Industry & Industry Associations – Tas	RE: Suggested additional core units The "extra" units are not suitable in all instances so they shouldn't be in the core	The suggested additional core units have been moved to electives.
RTO – Vic	RE: Suggested additional core units No. "HACCP team" unit not relevant to all	The suggested additional core units have been moved to electives.
Industry/Union – Vic	RE: Suggested additional core units "lead teams" unit can be problematic in workplace because there's a supervisor on site	The suggested additional core units have been moved to electives.
RTO – Vic	Brewing doesn't have allergens. [We] cover these skills (and the traceability) as part of FSY3001. Feel that there is too much repetition. For brewing this could be problematic. FSY3001 is enough, but it might also be important enough for core	The suggested additional core units have been moved to electives, along with *FBPFSY3XX1* (because of the overlap with *FBPFSY3001)*. The traceability unit remains in core and there has been support for this, particularly given it was one of the main drivers for the project. The content of the unit addresses knowing what traceability is and how it is addressed

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
		in the operator role - it's not about having responsibility for recalls, which would be the domain of specialists.
Industry Association – National	RE: Suggested additional core units Equipment maintenance is good for core	There has been little support for this unit to be included in core because so many processing lines require technical specialists to undertake maintenance. Unit has been moved to the electives.
Industry/Union – Vic	There is starting to be more of an expectation for operators to have equipment skills	
Industry/Union – Vic	RE: Suggestion of GMP unit in core yes, get smashed on GMP – now gets more of a higher rating than HACCP. Have people in house do a GMP walk every day	New GMP unit added to core of qualification.

Comments related to Elective Units – Specialisations

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	Brewing specialisation re: FBPGRA3XX7, FBPGRA3XX8 – For large breweries all their malt is purchased and supplied by a maltster who treats the grain and supplies the malt to a set and agreed specification – colour, flavour, moisture, diastatic activities. The operators themselves have nothing to do with the malt but send it to the mill and monitor the milling of the grain into grist for mashing. We do deliver the knowledge of what a maltster does and how the malt comes to the brewing in terms of colour, flavour, diastatic power e.c.t as it is important they understand that from the milling mashing point of view – so currently some of this knowledge sits in the first half of the wort unit – again probably why the wort unit is so massive!!	The malt focussed units are optional in the specialisation.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	Brewing specialisation Add in Perform basic tests???? – At every step of the brewing process there are tests that needs to be performed. They do not generally have CCP so they rely solely on strong Quality processes and along the way are constantly testing and measuring quality parameters whether it be pH, specific gravity, alcohol, bitterness, haze, colour, sensory, dissolved oxygen, CO2. Quality testing is critical to controlling the entire beer making process so I believe it could have its place in the skill set – without it the brewer has no control and no idea of the adjustments that need to be made to regain control.	*MSL973001 Perform basic tests* added to the Brewing specialisation
RTO – Tas	no provision for specialisation in Fruit and veg. Packaging has become the poor cousin of production - no specialist packaging units at Cert III	Enrolments in FBP units related to fruit and veg processing have been extremely low (and in some cases none) and as such the units were proposed for deletion in the first draft of this project. Whilst there have been requests for the units to be reinstated (new drafts of these units are available now in draft 2), there has not been a request for a specialisation in fruit and vegetable processing. The relevant units have been added to the elective bank of the Certificate III should there be an industry need for a specialisation to be created in this space the qualification can be updated to accommodate it. A packaging specialisation has been added as an option in the second draft of the qualification, and AQF2 packaging units added to elective bank. Note there are FBP skill sets for packaging are also available, such as *FBPSS00034 Bottling and Packaging Labelling Operator Skill Set* and *FBPSS00035 Carton Packaging and Palletising Operator Skill Set*.
RTO – Tas	combine pet food and stock food and incorporate fish food - non-human?? Animal food??	The two specialisations meet very different needs. Description of Stock feed updated to include feed for fish
RTO – Tas	RE: Dairy processing specialisation - suggested additional units - Butter churning	The butter churning and butter oil units were originally listed for deletion because they have had no enrolments in the last 5 years. However, following feedback, these have now been updated and added to the Dairy specialisation. *FBPOPR2057 Operate a membrane process* has been

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
- butter oil (AMF) - Operate a membrane process is missing from Cert II and III	combined with *FBPOPR2037 Operate a filtration process* and is now titled *FBPOPR3X12 Operate and monitor a filtration process*. It is included in the Dairy specialisation in Certificate III and can be imported into the Certificate II.
RTO – Qld	RE: Quality Control Specialisation Agree with 989. I would like to see some an expansion of the units to include: MSL974017 Prepare, standardise and use solutions MSL974019 Perform chemical tests and procedures MSL954004 Obtain representative samples in accordance with sampling plan FBPSUG3007 Perform factory control tests FBPSUG2024 Perform standard tests on cane samples The three units can add skills to those who are testing products for consistency as part of a production process particularly those involved taking a fresh product and turning it into a food product e.g. juice or packaged vegetables. Correct sampling is an important aspect to the QA/QC process. I have found that testing for chemical residue in the fresh food industry before processing has been slowly increasing over time. Which is why the first two units are needed. In the work that I do laboratory and QC/QC is blended together a holistic approach to processing food. The last two units are important not just for the sugar industry but also for understanding the manufacturing process and the sampling that occurs in the production. A unit is needed of some description for testing fresh produce before processing hence the last unit. Also I would like to suggest some complementary units for the quality stream are good for a control room/processing perspective, but	The title of the 'Quality Control' specialisation has been updated to 'Quality" - the intent is that this specialisation is for those who contribute to quality in an operational role. Overseeing quality would really be a higher-level role, and three of the MSL units suggested as additions are at AQF4 - the intent of the specialisation is not for a role at AQF4. To meet the needs of the Sugar Industry Award (EBA), *MSL974019* and *FBPSUG3007* have been added to the specialisation.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
quality also is reliant on the information that would be collected by a person at AQF Certificate III which could include - FBPSUG3007 Perform Factor Control tests - FBPSUG Perform Standard Tests on Cane Samples - MSL954004 Obtain representative Samples in accordance with a sampling plan - FBPSUG3008 Analyse and con workplace information	
RTO – SA	RE: Sales Specialisation We have a number of smaller organisations that utilise this unit: BSBCUS301 Deliver and monitor a service to customers as part of FBP30117	Unit added to Sales specialisation
RTO – Tas	RE: Stock Feed Specialisation perhaps combine pet and stock and make animal consumption - Fish Food processing doesn't fit into either category.	The descriptor for the Stock Feed specialisation has been expanded to include feed for fish, and extra unit about pre-processing raw materials also added
RTO – Vic	RE: Inclusion of "MSL973016 Perform aseptic techniques" and "MSL974017 Prepare, standardise and use solutions" in Quality Control Specialisation Inappropriate requires the set up and use of laboratory testing	These two units are in the general elective bank and can be selected to support the Quality specialisation where and if required… the intent of the specialisation is not to focus solely on laboratory work (there are specialist qualifications in Lab work should this be required)
RTO – Qld	RE: MSL units in Quality Control Specialisation While I agree with [comment above] that it not the best unit MSL974017, The unit above MSL973016 is far more difficult and requires a laboratory. MSL974017 would be required for either doing the juice extraction testing or knowing how the juice extraction was undertaken, the unit would be better to keep unless an alternative can be identified	
Industry – National	RE: Oil refining Specialisation I have scanned the food and beverage processing skills standards and cannot find any reference to "cold pressing" and "malaxation" which are key steps in the production of virgin olive oils.	Units developed, as suggested.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
In the Cert III Qualification, one of the skill sets is oil production. However in the specialisations this is listed oil refining – which is not the same thing. All of the units detailed in the Group E specialisation - Oil Production relate to refining or cleaning up food oils However, Virgin Olive Oils which are produced by the milling and cold pressing of fresh olive fruit – which is not included in the oil production specialisation. What appears to be missing are units of competency for the following operations: -Operate and monitor a hammer Mill -Operate and monitor a Malaxer -Operate and monitor a separation process (variation on the dairy competency) -Operate and monitor storage of virgin olive oil	
Industry – WA	RE: Oil refining Specialisation Oil specialisation only covers seed oils (olive oil, sunflower oil). Only taking seed, degumming, turning it in to oil. Flavouring oils and natural oils would be a bit different.	Extra units developed for Edible Oils specialisation - see above.
Industry Association – Qld	RE: Oil refining specialisation Rename "oil refining" specialisation to "edible oils	Oils specialisation now titled 'Edible Oils'
RTO – Vic	like the idea of the specialisations -good idea. Would like to see it in Meat TP, too	Thank you for the feedback. This will be captured in our improvements register for the AMP Training Package
RTO – Vic	Query the 5 units for a spec – someone making yoghurt (for example) would struggle to get the specialisation in dairy processing. Really likes the concept a lot, but not sure if it can work? (Add filtration unit? Pumping? Pasteurisation?)	Through consultation with SMEWG, additional units have been added to the Dairy specialisation that should make it easier to achieve this specialisation. The added units are *FBPOPR3X12 Operate and monitor a filtration process* and *FBPOPR3XX8 Operate and monitor a heat treatment process* (to cover pasteurisation). A pumping unit (*FBPOPR2045X Operate pumping equipment*) has also been included in AQF2 elective bank.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association – Tas	Good to know the Sales specialisation is there – good for small businesses	Great and thank you for your comments.
Industry – National	RE: additional units for Brewing specialisation Depalletising, Filling, pasteurisation, labelling, clustering, carton erection, Palletising	Units covering these topics added to optional 'bottling and Packaging' specialisation

Comments related to Elective Units – General Comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – SA	RE: Additional Elective Units It is good that TAEDEL301 is listed as a General Elective, but the following three TAE units should also be added (as is currently the case for FBP30117): TAEASS401 Plan assessment activities and processes TAEASS402 Assess competence TAEASS403 Participate in assessment validation By including these three units, this allows an RTO to implicitly be able to deliver the skill set: TAESS00015 Enterprise Trainer and Assessor Skill Set, without having to separately have these units as part of its scope. A number of our clients require this skill set for their enterprise trainers. By including these units as part of the Cert III in Food Processing we avoid having our risk rating as an RTO with ASQA being increased and also avoid the additional scope application and costs to add these units with ASQA.	From a technical aspect, this is not considered good practice. The process to be approved to deliver TAE units is more rigorous than other training package units, and by including the TAE units in this FBP qualification, RTOs would bypass this rigorous process. RTOs should apply for scope to deliver TAE skill sets separately from this qualification. Note one TAE unit is included in the elective bank – *TAEDEL301 Provide work skill instruction* – as this is relevant to the job role.
RTO – SA	RE: Additional Elective Units There should be a manual handling elective as part of Group J, such as:	Unit added to elective bank

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	HLTWHS005 Conduct manual tasks safely as it falls into most Cert III roles	
RTO – Tas	RE: Additional Elective Units MSMSUP310 contribute to plant documentation - good unit across all areas	Unit added to elective bank
RTO – Tas	RE: Additional Elective Units MSL973001 Perform basic tests falls into most of the Cert III roles. Add to General	This unit is already listed and can be chosen as a general elective under the packaging rules
RTO – SA	RE: Additional Elective Units The unit: FBPOPR2069 Use numerical applications in the workplace should be a general elective in Group J as it falls into most Cert III roles	Unit added to elective bank
RTO – SA	RE: Elective units 'FSKDIG03 Use digital technology for routine workplace tasks' would be a better unit here as it's at ACSF 3 Numeracy. FSKDIG02 is at ACSF 2 Numeracy perhaps both units could be here	Elective bank updated to include ACSF 3 Digital Technology unit (please note it's not a Numeracy unit)
RTO – Tas	RE: Inclusion of elective unit "MSS403040 Facilitate and improve implementation of 5S" would prefer the AHCWRK310 unit - which is about 1:1 on the job training AND coaching. Better for smaller workplaces because they don't have to train 3 different individuals/small groups.	MSS unit replaced with AHC unit, as suggested
RTO – SA	RE: Additional Elective Units The following electives should be part of Group K: FBPOPR2073 Work in a socially diverse environment	Units added to (AQF2) elective bank

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	FBPPPL2001 Participate in work teams and groups FBPOPR2071 Provide and apply workplace information FBPOPR2070 Apply quality systems and procedures	
RTO – SA	With group B electives in current qual have to choose 6 which not everyone could do (or would struggle to do), so this new qual looks like a step in the right direction Always felt Group B electives were odd - half would never touch. Units we wanted to do were restricted.	Great - good to know - thanks for the feedback
RTO – Vic	"FBPBPG2XX6 Operate a packaging process" – add to Group K	Unit added to the AQF2 elective list (Group numbering has been updated)

General Qualification comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	RE: Sales Specialisation As a general observation: Sales in this sector, like any other industry is made up of primarily white collar workers who may have had experience on in production but not necessarily so. Sales staff may never leave the admin /office area and would have no opportunity or need to operate interrelated processes in a packaging or production system (FBPOPR#XX5) or Monitor the implementation of food safety and quality programs (FBPFSY3001X). Therefore the core units and limitations within electives would mean very little or no uptake in this stream	The Sales specialisation is really intended for business to business sales rather than retail sales, and SMEs have advised that some skills and knowledge around actual food processing are required.
RTO – Qld	The idea behind the structure can work. Can a useful general qualification be developed it not that explicit. If we were allowed to pick and choose from more than one stream	The packaging rules allow for electives to be chosen from across any group - the wording of this section has been updated to make this clear.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
maybe. Some of the specialization needs to be fleshed out a bit more with focuses groups on the specialization. This might take some of the more of the "what the" when reading the list out of the proposed structure.	
RTO – Vic RE: Qualification Description Take out comment -This qualification does not cover meat, including poultry meat, or seafood	The sentence has been reworded alert users to the fact that specialist meat and seafood processing units and qualifications are available in other training packages, and all stakeholders should have that information. The descriptor of the current qualification refers to processing poultry and that specialist skill is now included in the Meat Training Package. Units from those Training Packages can be imported into this qualification.
RTO – Vic As an initial comment This proposed Program leaves very little scope for a general qualification that is useful and appropriate for production workers. The selection of general electives (J) is populate with numerous units that are inappropriate for the audience. Please refer to future comments	The packaging rules allow for electives to be chosen from across any group - the wording of this section has been updated to make this clear.
RTO – Vic RE: Unit selection example units for a General Operator qualification: [FBPFSY3XX1 Control contaminants and allergens in the workplace FBPTEC3001 Apply raw materials, ingredient and process knowledge to production problems FBPOPR3XX5 Operate interrelated processes in a production or packaging system FBPWHS3001X Contribute to work health and safety processes FBPOPR3XX2 Participate in sensory analyses FBPPPL3002X Establish compliance requirements for work area FBPOPR3004 Set up a production or packaging line for operation	Thanks for the suggestions. The revised draft is close to what is suggested here (*FBPFSY3XX1 Control contaminants and allergens in the workplace* is an elective and the core now includes a GMP unit at AQF3). *MSS402051 Apply quality standards* added to Group L electives.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
	FBPOPR3X14 Receive and store raw materials MSS403040 Facilitate and improve implementation of 5S FBPOPR2064 Clean and sanitise equipment] Plus recommendations: FBPPHM2001 - Follow work procedures to maintain Good Manufacturing Practice (FBP version of) MEM13003B - Work safely with industrial chemicals and materials MSS402051 - Apply quality standards	
RTO – Vic	The current FBP30117 includes an imported elective MEM13003B - Work safely with industrial chemicals and materials that is suited to the standard operator as it talks to the desire to control contamination by using chemical safely. It would be desirable to have an FBP unit the achieves the same outcome as MEM13003B - Work safely with industrial chemicals and materials is superseded by MEM13003 - Work safely with industrial chemicals and materials BUT this current unit require 3 pre requisites that seem redundant in this context MEM11011 Undertake manual handling MEM13015 Work safely and effectively in manufacturing and engineering MEM16006 Organise and communicate information	Chemical contamination is now included in the FBPFSY units and using chemicals safely is covered by the FBPWHS units.
RTO – Vic	A note that enrolments for the Certificate III in Food Processing are currently low - if the new revised qualification is deemed not equivalent to the current version and we need to reapply to have the qualification on our scope, we may not be able to do this, and would no longer be able to deliver the Certificate III in Food Processing. (The Certificate III in Food Processing is not currently on the free TAFE list in Victoria which contributes to this difficulty.)	Feedback noted - thanks. The issue around reapplying to have the qualification on scope and funding issues is outside of the remit of the project and whilst the impact of changes are taken into consideration during projects, Skills Service Organisations are required to adhered to the Standards for Training Packages, and the Training Package Development and Endorsement Policies .

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	Merging of FBP30117 Certificate III in Food Processing and FBP30617 Certificate III in Food Processing (Sales) Enrolments in the 'sales' qualification are much, much lower than in general food processing qualification but still amounted to 939 from 2015 to 2018. Does this warrant a merger? 64 electives have been removed from FBP30117 Certificate III in Food Processing and 61 from FBP30617 Certificate III in Food Processing (Sales). Two units can be brought into the new qualification under the import rules. Will this be sufficient to meet industry's needs?	Feedback received so far supports the rationalisation of the number of units and the merger of the qualifications as it still meets the needs of the industry,
RTO – Vic	I believe the introduction of 'specialisations' will be advantageous. Would a similar approach be appropriate at the Certificate II level? This industry is very diverse which presents challenges in the design of training products to meet all of industry's requirements. It is essential that employers from every sub-sector of the industry (and /or trainers supporting those employers) have input to this review process.	There has been no feedback saying the general Certificate II doesn't suit the targeted need, or any support for the Certificate II to have specialisations. Many believe it is too early to specialise. The feedback has been generally positive about the changes to the qualifications. Yes agreed – feedback from stakeholders is essential to all training package projects (and also required under the Standards). The project team is doing all it can to get feedback from as many stakeholders and sectors as possible (including RTOs, trainers/assessors/employers). To date more than 500 stakeholders have been contacted regarding this project, to give everyone the opportunity to contribute with their feedback.
RTO – Vic	Dropped a lot of communication units – either add to qual or increase number of units that could be imported	There are several communication type units included as electives - the concern is that with too many communication unit electives the focus of the qualification will shift from food processing technical work. Also note that foundation skills (listed in the Foundation Skills field) in all units have been refined to include an emphasis on the relevant learning, reading, writing, oral communication and numeracy skills.
RTO – Vic	Going to struggle with general operational level for people get the qualification. Can't get fruit/veg, or generic things	Fruit/veg related units that were proposed for deletion (no enrolments over last 5 years) have been updated and listed in electives, so can be covered in general qualification. Several generic units are also included as electives.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	[Industry] group ss asking - why aren't more HR units being done? Work skill instruction, other TAE units (the skill set?) Current Training Package doesn't add value to people in the workplace and improve skill levels of people in the workplace. Would like to see 3 or 4 TAE units. Would also like to see a QA unit, and Hygiene sanitation and operation Things like allergens in core not needed because it's already part of what people have to do to just walk in the door (i.e. workplaces that don't let peanuts in to the facility at all from day 1)	*TAEDEL301 Provide work skill instruction* is included in the elective bank, along with seven FBPPPL units (HR related units) and several FSK units. The TAE Assessor Skill Set units will not be added as listed electives (scope to deliver this skill set should be applied for independently outside of this qualification – see comment above). There are several hygiene/sanitation units (*FBPOPR2063, FBPOPR2064* and new GMP unit), there is an optional Quality specialisation that includes several quality-related units and FBPOPR2070 and MSS402051 are included as electives. Addressing allergens is a major driver for this project and industry stakeholders have made a strong case for allergens to be addressed in training for work in food processing. There is, however, an overlap between *FBPFSY3001X* and *FBPFSY3XX1 Control contaminants and allergens in the workplace,* so *FBPFSY3XX1* has been removed from the core and included in the qualification as an elective.
RTO – Vic	some soft skills that seem to be missing in the qual	Several 'soft skill' units have been listed (see comment above).
Industry – Tas	Making fish food – can't get Cert III in pet food or stock feed specialisation	The description of Stock feed updated to include feed for fish - process includes milling/mixing, blending nutrients and micronutrients, pelleting.
Industry – Tas	RE: Fish food Most logically the fish food would come under stock feed but it's [the stock feed specialisation] also not got the right units in it	The description of Stock feed updated to include feed for fish, and units added to specialisation to cover the production of fish feed.
RTO & Industry & Industry Associations – Tas	FBPOPR3XX5 unit includes packaging, but all other packaging units are at level 2. Would like to see a packaging specialisation in the Certificate III	Bottling and Packaging specialisation has been added as an optional specialisation.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry – Tas	Would a logistics specialisation work as well? And if so, the merged OPR unit wouldn't actually work as a core unit. Shouldn't be there. There are more than 2 departments in a factory now.	There are logistics-related units that could be chosen as electives, but there has been no other call for a specialisation in this qualification at this time from other experts in this field but will take note of this feedback.
RTO – NSW	I note there are some AQF level 3 units relating to distilling in the new Cert IV Artisan course so perhaps they could be included in the Cert III Food Processing	Thanks for the suggestion. A distilling specialisation has been added to the latest draft of the *Certificate III in Food Processing* – we would be keen to hear your feedback on this.
RTOS – NSW	Could you combine and make Brewing/Distilling specialisation at unit Cert III Food Processing?	
RTO – NSW	Packaging is an important part of the food processing. This happens in Cert III Wine Industry Operations with the Bottling & Packaging specialisation	Bottling and Packaging specialisation has been added as an optional specialisation to *Certificate III in Food Processing*.

2. Summary of feedback on draft Skill Sets

FBPSSXXXX01 Manage allergens in food processing Skill Set

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association – National	We believe this adequately addresses the issue.	Great – thanks for the feedback

FBPSSXXXX02 Check traceability of food products Skill Set

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	

3. Summary of feedback on draft Units of Competency

BEV - Beverages

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPBEV2XX1 Identify key stages and beer production equipment in a brewery		
No feedback requiring action.		
FBPBEV3XX1 Operate and monitor a wort production process		
RTO – Vic	Suggestion to break up the FBPBEV3XX1 – this unit requires the knowledge and skill and operation of five pieces of equipment where a great deal of chemistry, physical change and reactions are taking place. Would like to see it separated into Milling Mashing and Lautering – creating wort as one unit, (Kettle and Whirlpool) in the second stage (post wort treatment and sterilisation).	Advice was sought from the SMEWG who advised not to split the unit - all these processes happen simultaneously (except perhaps for milling, but the suggestion here is not to just separate milling) - the others don't stop - they are all part of the one task.
FBPBEV3XX2 Prepare and monitor beer yeast propagation processes		
RTO – Vic	Great unit but not all breweries propagate their yeast. Some buy in dried yeast or yeast prepared by a supplier so they would not be able to do this unit. Even in large breweries there is a Quality role that is employed solely for yeast husbandry and propagation and no operators have anything to do with this nor are they allowed access!	OK - thanks. The unit is an option in the specialisation - it does not need to be delivered where it doesn't match client needs.
FBPBEV3XX3 Operate and monitor a brewery fermentation process		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	Would recommend breaking this unit back up into the separate units of Fermentation and Maturation. These two units in their own right are very large units and a lot of knowledge is taught across these two units. Fermentation is a large unit regarding the chemical and microbiological behaviours of converting sugar to alcohol and all the resulting by-products and controls. Maturation is all the chemical and microbiological behaviours around taking a "green beer" that contains many undesirable compounds and how to condition it into a palatable product with required shelf life and physical stability. Lots of quality and sensory issues are controlled here but very different to what is occurring at Fermentation. If left combined the unit would be too big and they are not the same, very different things occurring. The idea to combine maturation and fermentation because some little brewers do all this in one tank – does not fit for the big breweries, they are separate areas and equipment and very different chemistry and product changes are going on across these two stages.	There have been follow up discussions around this merge/unmerge and delivery options. Unit has been 'unmerged' - the two separate units are *FBPBEV3XX3 Operate and monitor a brewery fermentation process* and *FBPBEV3XX7 Operate and monitor a beer maturation process*. Those who suggest for the one unit can still combine the two for delivery purposes.
RTO – Vic	PC 2.6 Undertake analysis to ensure yeast effectiveness and freedom from bacterial contamination according to food safety and workplace procedures. Is an operator expected to undertake analysis or "take samples" for analysis as in the PE. 'Analysis' is potentially a large complex task undertaken in a laboratory. Is this an appropriate expectation of an operator?	The PC has been checked by industry specialists and OK'd as appropriate for an operator. They noted that not all analysis is complex as it could be a matter of observing a reaction that could be changed by adjusting the temperature in which the yeast is kept.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPBEV3XX4 Operate and monitor a beer filtration process		
RTO – Vic	Agree with these combining. Both these operations are geared toward meeting final specifications and all revolve around the cleaning up and polishing of the product.	Great - thanks for the comment.
FBPBEV3XX5 Operate and monitor juice processing		
RTO – Vic	Should this unit include Elements related to clean down and processing of waste materials?	Cleaning' and 'disposal of waste added to PC 5.1, which now reads: '5.1 Follow and apply workplace cleaning, housekeeping and environmental procedures, including appropriate disposal of waste'
FBPBEV3XX6 Control and monitor fruit washing and milling		
RTO – Vic	Small typo – redundant table header at the top of page 2	Thanks - repeated header row removed

BPG - Bottling & Packaging

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPBPG1XX1 Pack or unpack product manually	
No feedback requiring action.	
FBPBPG2XX1 Operate a beverage packaging process	
No feedback requiring action.	
FBPBPG2XX2 Operate a case packing process	
No feedback requiring action.	
FBPBPG2XX3 Operate a form, fill and seal process	
No feedback requiring action. Note - Unit code updated to be at AQF3, to better match job task.	
FBPBPG2XX4 Operate a fill and seal process	
No feedback requiring action.	
FBPBPG2XX5 Operate a high speed wrapping process	
No feedback requiring action. Note - Unit code updated to be at AQF3, to better match job task.	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPBPG2XX6 Operate a packaging process		
No feedback requiring action.		
FBPBPG3XX2 Operate and monitor a carbonated beverage filling process		
RTO – Vic	In large breweries the operators that are in the brewhouse do not work in packaging and vice versa. You are either in packaging or production not both. This unit could not be chosen for this reason for these enterprises.	Thank you for the feedback. The unit has been removed from the Brewing specialisation and added to the new Bottling and Packaging specialisation.

CHE - Cheese

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPCHE3001X Conduct cheese making operations		
RTO – Vic	PC 4.5 Adjusting processing parameters as a result of test results, to ensure product meets specification	Continuous grammar corrected ('ing' removed)
FBPCHE3002X Carry out processing for a range of artisan cheeses		
No feedback requiring action.		

CON - Confectionery

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPCON2XX1 Operate an enrobing process	
No feedback requiring action.	
FBPCON2XX2 Operate a chocolate tempering process	
No feedback requiring action.	
FBPCON3XX1 Operate a complex chocolate depositing process	
No feedback requiring action.	
FBPCON3XX2 Operate and monitor a boiled confectionery process	
No feedback requiring action.	
FBPCON3XX3 Operate and monitor a chocolate conching process	
No feedback requiring action.	
FBPCON3XX5 Operate and monitor a confectionery depositing process	
No feedback requiring action.	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPCON3XX6 Operate and monitor a granulation and compression process	
No feedback requiring action.	
FBPCON3XX7 Operate and monitor a panning process	
No feedback requiring action.	
FBPCON3XX8 Operate and monitor a chocolate refining process	
No feedback requiring action.	
FBPCON3XX9 Operate and monitor a starch moulding process	
No feedback requiring action.	

DPR – Dairy Processing

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPDPR3XX1 Operate and monitor a curd production and cutting process	
No feedback requiring action.	
FBPDPR3XX2 Operate and monitor a cheese pressing and moulding process	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPDPR3XX3 Operate and monitor a fermentation process	
No feedback requiring action.	
FBPDPR3XX4 Control batch processing for powdered milk products	
No feedback requiring action.	

EGG - Egg

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPEGG2001X Work on an egg grading floor	
No feedback requiring action.	
FBPEGG2002X Operate egg grading and packing floor equipment	
No feedback requiring action.	

FSY – Food Safety

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPFSY1001X Follow work procedures to maintain food safety		
Industry Association – National	RE: Application It's important to reinforce that food safety includes food allergen management Additional specific changes also suggested	Suggestions adopted
Industry Association – National	RE: Performance Evidence Suggested addition - (including food allergy management) Additional specific changes also suggested throughout	Suggestions adopted
FBPFSY2001 Implement the food safety program and procedures		
RTO – WA	Unit application: Could the wording be changed to '… operation of production and/or packaging..' (include 'or')	Suggestion adopted
RTO – WA	KE: after 'Food Standards Code' please add 'relevant to job role'	Suggestion adopted
RTO – SA	RE: licensing statement Food Standards cover all States and Territories.	Yes, but there are some variations for licensing of food processing premises between the states/territories.
RTO – SA	Re: Wording in Application Add "food safety"	Suggestion adopted
RTO – SA	RE: Wording in Knowledge Evidence they either need to know it, or they don't	Thank you for the feedback – the wording "as appropriate" has been removed from this statement clarifying the intent.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – SA	RE: Wording in Knowledge Evidence 'understanding' is ambiguous - should delete	basic understanding' removed from dot point
RTO – SA	RE: Wording in Knowledge Evidence Under the Food Standards Code all States and territories are bound by this legislation. (State and Territory food legislation)	Some variations exist around licensing/local government food safety audits, etc.
RTO – SA	RE: Wording in Knowledge Evidence This is the legislation referred to in the previous statement	
RTO – SA	RE: Wording in Knowledge Evidence [awareness] - this term has always been ambiguous - how do you assess awareness? Suggest delete	Awareness' can be assessed - do candidates know that food safety legislation exists? If 'awareness' is deleted, and replaced with, for example, 'knowledge of food safety legislation', then the point becomes much more difficult to assess. The dot point has been updated to say: 'food safety management arrangements in the workplace, including an awareness of food safety legislation and its general purpose'
Industry Association – National	Suggested addition of following text in PC 1.3 and Performance Evidence, (including food allergen management)	Suggestion adopted
Industry Association – Qld	Change the name of FBPFSY2001 from Implement the food safety …to Apply the food safety……. Because implement indicates a higher cognitive process than apply and to be consistent with the word apply being used in two other core units.	Although there is support from multiple stakeholders to change the title of this unit, there are repercussions to multiple other qualifications (including qualifications in training packages other than FBP) that need to be taken into consideration. Changing the title of this unit will also have an impact on RTOs due to the large number of enrolments in the unit. These concerns will need to be considered during this draft 2 phase, and a final decision made on whether to change the title to be made prior to Validation phase.
RTO & Industry Associations – Qld	The term "implement" is too high for a level 2. "Participate" or "apply "Participate in food safety" would make more sense to industry than "Implement". "Implement" implies you can supervise, write etc.	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry – Tas	Agree with issues with wording of "implement" in FBPFSY2001. Suggest "apply" as an alternative	
FBPFSY2XX1 Maintain food safety when loading, unloading and transporting food		
Industry Association – National	RE: Assessment Conditions Check for provision of allergen information e.g. product information form Additional specific changes also suggested	Suggestions adopted. Some information also added to *FBPOPR3X14*, where it seems a better fit.
FBPFSY3001X Monitor the implementation of food safety and quality programs		
Industry Association – National	Suggested addition of following text in Application and Performance Evidence, (including food allergen management)	Suggestions adopted
FBPFSY3002 Participate in a HACCP team		
RTO – WA	Assessment Conditions – the first level dot point that states 'relationships' is weird – how can a relationship be a condition? Couldn't it just require interactions with team members?	The dot point is standard text in the Skills Impact template for units. It's intended to introduce the dot point/s below, so in this instance, what's required is that the candidate has interactions with team members. A note to help clarify this has been added to the Companion Volume Implementation Guide.
Industry Association – National	Suggested addition in PC 1.1 & Performance Evidence	Suggestions adopted
FBPFSY3XX1 Control contaminants and allergens in the workplace		
Industry Association – National	RE: title of unit Perhaps consider Control contaminants and allergens in food processing	Suggestion adopted

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association – National	RE: Elements & Performance Criteria PC 4.2 - This doesn't make sense - is it risk of cross contamination of allergens or risk of the allergen being added? Both need to be considered and this should be clearly specified. PC 4.3 - Will there be tools provided to assist them with this? PC 5.4 - Are there any for allergens?? Additional specific changes also suggested	Thank you for the feedback – The PCs in Element 4 have been reworked to remove any ambiguity
Industry Association – National	RE: Foundation Skills Reading - Currently food allergen management is not usually considered part of food safety even though it should be, so it may be helpful to spell this out initially until we see a cultural change in what people consider to be food safety Writing - Both cross contamination and erroneous addition of an allergen Additional specific changes also suggested	Reading and Writing skills clarified as suggested.
Industry Association – National	RE: Knowledge Evidence Will there be documentation for food allergen management? Additional specific changes also suggested	Suggestions adopted as specified
RTO – Qld	Unit FBPOPR3001 Control contaminants and allergens in the workplace could be supported by a pathway unit, like the example provided - FBPOPR2001 Improving allergy responsiveness in foods and service. This unit would require no prerequisites would be beneficial to those who would undertake a clustered skill set. This would ensure when the individual is aware of the possible questions they me asked and recognise if a	Many thanks for the suggestion. The issue with the proposal is that it repeats some of the content in the targeted unit and would end up being too knowledge-focussed (whereas units need to predominantly focus on actual job tasks).

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	problem exists in the workplace. Additional documents provided.	
FBPFSY3XX2 Participate in traceability and recall activities		
RTO – Vic	Workers at this level would not be involved in the activities prescribed in the performance criteria. This are activities conducted by a handfull of people in Quality Control. Recalls refer to products that have already been dispatched from the production process. If the intent is to train operators to act in such a manner as to reduce recalls and follow traceable manufacturing procedures then this unit should be replaced with FBPPHM2001 - Follow work procedures to maintain Good Manufacturing Practice requirements (This unit would need adjusting to refer to Food manufacturing and not Pharmaceutical processes)	Emphasis on product recalls removed from title and unit. The intent of the unit is for operators to understand their role in the chain of traceability of a product. Issues around traceability are a major driver for this project and many employers want traceability explicitly addressed. A new GMP unit has been developed and added to core of Certificate III.
Industry Association – Qld	Change core unit FBPFSY3XX2 name to Participate in traceability and recall systems or processes because the trainees may not have the opportunity to participate in activities for recall of product. However a trainee can be trained in the recall process.	Emphasis on product recalls removed. The intent of the unit is for operators to understand their role in the chain of traceability of a product. Issues around traceability are a major driver for this project and many employers want traceability addressed.
Industry Association – Qld	Performance Evidence – add …. in a team to identify the traceability and recall process for at least one processed ……. Otherwise the performance evidence will only assess the traceability aspect of the unit and not recall.	Emphasis on product recalls removed.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association – National	RE: Title of unit It needs to be clear that food allergen contamination or erroneous addition of a food allergen is a reason for recall Additional specific changes regarding reasons for recalls are also suggested in Application, Elements & Performance Criteria and Knowledge Evidence	Specific suggestions adopted
RTO – Qld	Ok with the traceability part of this unit being in the core of Certificate III, but not the recall part. The recall part is too high.	Emphasis on recalls removed from unit.
FBPFSY4XX1 Perform an allergen risk review		
Industry Association – National	RE: Elements & Performance Criteria PC 5.3 - suggested addition - including which test kits and laboratories are appropriate for the particular product being tested. This is critical as different labs are only able to effectively test certain foods for certain allergens Suggested addition - PC 5.6 Initiate a recall process where required	Suggestions adopted
Industry Association – National	Specific edits to structure and content of preliminary draft suggested at workshop	Suggestions adopted
Industry Association – National	Specific edits to structure and content of preliminary draft suggested at workshop	Suggestions adopted
Industry Association – National	Specific edits to structure and content of preliminary draft suggested at workshop	Suggestions adopted

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association – National	We talk about cross contamination with bacteria so we should use the same terminology for allergens - consistency under the umbrella of food safety Suggested edits throughout unit regarding this point.	Suggestions adopted
Industry Association – National	RE: Knowledge Evidence Suggested addition - • Understanding which test kits and laboratories can be used to test particular foods and particular allergens *The legislation currently requires gluten rather than wheat, but the source of the gluten must be declared The FSANZ Plain English Allergen Labelling project (P1044) will change this Additional specific changes also suggested	Wording of KE dot point updated
FBPFSY4XX2 Provide accurate food allergen information to consumers		
Industry Association – National	Specific edits to structure and content of preliminary draft suggested at workshop	Suggestions adopted
Industry Association – National	Specific edits to structure and content of preliminary draft suggested at workshop	Suggestions adopted
Industry Association – National	Specific edits to structure and content of preliminary draft suggested at workshop	Suggestions adopted
Industry Association – National	RE: Elements & Performance Criteria PC 1.5 - Legislation changes and businesses and	Suggestions adopted

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	staff must have a process in place to keep up to date with the legislation	
Industry Association – National	We refer to cross contamination in relation to bacteria and should use the same terminology for allergens to ensure consistency under the umbrella of food safety	Suggestions adopted
Industry Association – National	RE: Knowledge Evidence Legislation currently stipulates gluten and the source of the gluten. However the FSANZ Plain English Allergen Labelling project (P1044) will change this	Wording of KE dot point updated
FBPFSY4XX4 Conduct a traceability exercise		
Industry Association – National	Suggested addition in Application regarding contamination Suggested addition in Performance Evidence regarding storage	suggestions adopted
FBPFSY5XX1 Develop an allergen management plan		
Industry Association – National	Specific edits to structure and content of preliminary draft suggested at workshop	Suggestions adopted
Industry Association – National	Unit structure should be reworked to focus on various areas / departments / and pre-requisite programs that support HACCP and what procedures are used to obtain information about allergens, manage and control them. It's all really overarching stuff.	Unit reworked as a result of this feedback from SME

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association – National	Specific edits to structure and content of preliminary draft suggested at workshop	Suggestions adopted
Industry Association – National	RE: Elements & Performance Criteria We need to include something that addresses checking whether an allergen has been added either intentionally or unintentionally not just checking for allergen contact via cross contamination	Suggestions incorporated into revised unit
Industry Association – National	The term cross contamination is used for bacteria and we should use the same term for food allergens for consistency under the umbrella of food safety Suggested edits throughout unit regarding this point	Suggestions incorporated into revised unit
Industry Association – National	RE: PC 3.6 Need to include something that states that if the cross contamination risk cannot be eliminated or reduced, appropriate allergen declaration must be applied to the product label Additional specific changes also suggested	Suggestions incorporated into revised unit
Industry Association – National	RE: Knowledge Evidence - tests Need to ensure the correct test is being undertaken for the food and allergen being tested and also if sending of to an outside lab, that they are able to conduct the correct test for that particular food and allergen RE: Knowledge Evidence - substances Currently need to declare gluten and the source of	Suggestions incorporated into revised unit

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	the gluten. However, FSANZ Plain English Allergen Labelling project (P1044) will change this	
FBPFSY5XX2 Design a traceability system for food products		
Industry Association – National	Suggested addition in Application - (e.g. bacterial contamination, undeclared allergens)	Suggestion adopted
FBPFSY5XX3 Plan to mitigate food fraud		
No feedback requiring action.		

GRA – Grain Processing

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPGRA3001X Control batch processing for micronutrients or additives in grain products	
No feedback requiring action.	
FBPGRA3002X Confirm feed product meets animal nutrition requirements	
No feedback requiring action.	
FBPGRA3XX1 Operate and monitor a liquid, mash or block stockfeed process	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPGRA3XX2 Operate and monitor a grain conditioning process	
No feedback requiring action.	
FBPGRA3XX3 Operate and monitor a grain cleaning process	
No feedback requiring action.	
FBPGRA3XX4 Receive and handle grain in a storage area	
No feedback requiring action.	
FBPGRA3XX5 Operate and monitor a pelleting process	
No feedback requiring action.	
FBPGRA3XX6 Operate and monitor a scalping and grading process	
No feedback requiring action.	
FBPGRA3XX7 Prepare malted grain	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPGRA3XX8 Blend and dispatch malt	
No feedback requiring action.	

OIL – Edible Oils

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPOIL3XX1 Operate a degumming and neutralisation process		
Industry – NSW	Low to Medium use (most oils can be purchased already degummed or degumming is not required) with Medium to High Complexity (training course may be beneficial). Suggested edits in attached document.	Suggestions adopted
Industry – Vic	Suggested edits in separate attachment	Suggestions adopted
FBPOIL3XX2 Operate and monitor a bleaching process		
Industry – NSW	Highly used with High Complexity (training course would be beneficial). Suggested edits in attached document.	Suggestions adopted
Industry – Vic	Suggested edits in separate attachment	Suggestions adopted

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPOIL3XX3 Operate and monitor a deodorising process		
Industry – NSW	Highly used with High Complexity (training course would be beneficial). Suggested edits in attached document.	Suggestions adopted
Industry – Vic	Suggested edits in separate attachment	Suggestions adopted
FBPOIL3XX4 Operate and monitor a flake preparation process		
Industry – NSW	Part of the complecting process FBPGPS2002. Low to Medium use (specific process for mostly pastry fats) with Medium to High Complexity (training course would be beneficial).	Unit revised (not deleted) or This unit was originally proposed for deletion but following feedback this has now been reviewed and revised and feedback will be sought as part of the second draft public consultation process?
FBPOIL3XX5 Operate and monitor a complecting process		
Industry – NSW	Low to Medium use (specific process for mostly pastry fats) with Medium to High Complexity (training course would be beneficial).	Unit revised (not deleted) as above?
FBPOIL3XX6 Operate and monitor a soap splitting process		
Industry – NSW	Part of the Interesterification process FBPGPS2007. Medium use (specific process for functional fats) with Medium to High Complexity (training course may be beneficial).	Unit revised (not deleted)
FBPOIL3XX7 Operate and monitor an interesterification process		
Industry – NSW	Medium use with Medium to High Complexity (training course would be beneficial).	Unit revised (not deleted)

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPOIL3XX8 Operate and monitor a hydrogenation process		
Industry – NSW	Low to Medium use (oils can be purchased already hydrogenated or hydrogenation is not required. Additionally the industry is moving away from hydrogenated oils where it can) with Medium to High Complexity (training course would be beneficial).	Unit revised (not deleted)

OPR – Operational
AQF level 1

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPOPR1002X Operate automated washing equipment	
No feedback requiring action.	
FBPOPR1004X Prepare basic mixes	
No feedback requiring action.	
FBPOPR1005X Operate basic equipment	
No feedback requiring action.	
FBPOPR1006X Monitor process operation	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPOPR1007X Participate effectively in a workplace environment	
No feedback requiring action.	
FBPOPR1008X Take and record basic measurements	
No feedback requiring action.	
FBPOPR1009X Follow work procedures to maintain quality	
No feedback requiring action.	

AQF level 2

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPOPR2001X Work effectively in the food processing industry	
No feedback requiring action.	
FBPOPR2002X Inspect and sort materials and product	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPOPR2006X Operate a bulk dry goods transfer process	
No feedback requiring action.	
FBPOPR2007X Work in a freezer storage area	
No feedback requiring action.	
FBPOPR2010X Work with temperature controlled stock	
No feedback requiring action.	
FBPOPR2017X Operate a blending, sieving and bagging process	
No feedback requiring action.	
FBPOPR2024X Operate a cooling, slicing and wrapping process	
No feedback requiring action.	
FBPOPR2027X Measure non-bulk ingredients	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPOPR2028X Operate a mixing or blending process	
No feedback requiring action.	
FBPOPR2029X Operate a baking process	
No feedback requiring action.	
FBPOPR2032X Apply work procedures to maintain integrity of processed product	
No feedback requiring action.	
FBPOPR2033X Operate a depositing process	
No feedback requiring action.	
FBPOPR2038X Operate a grinding process	
No feedback requiring action.	
FBPOPR2039X Operate a frying process	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPOPR2041X Operate a mixing or blending and cooking process	
No feedback requiring action.	
FBPOPR2045X Operate pumping equipment	
No feedback requiring action.	
FBPOPR2046X Operate a production process	
No feedback requiring action.	
FBPOPR2048X Pre-process raw materials	
No feedback requiring action.	
FBPOPR2056X Operate a freezing process	
No feedback requiring action.	
FBPOPR2058X Operate a holding and storage process	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
No feedback requiring action.		
FBPOPR2059X Operate a continuous freezing process		
No feedback requiring action.		
FBPOPR2060X Operate an automated cutting process		
No feedback requiring action.		
FBPOPR2063 Clean equipment in place		
RTO – NSW / Industry	Suggest merging the two cleaning units *FBPOPR2063 Clean equipment in place* and *FBPOPR2064 Clean and sanitise equipment*. There is duplication here - the skills obtained in one unit could be applied in the other unit.	A merged unit has been created - *FBPOPR2XX3 Clean and sanitise food processing equipment* – which will be made available during Public Consultation phase 2 to gather feedback from stakeholders to determine whether there are two distinct job roles covered by the separate units, or if they can in fact be combined. It also should be noted that both of these units have high enrolments so this will need to be taken into consideration when making a final decision.
FBPOPR2064 Clean and sanitise equipment		
RTO – NSW / Industry	Suggest merging the two cleaning units *FBPOPR2063 Clean equipment in place* and *FBPOPR2064 Clean and sanitise equipment*. There is duplication here - the skills obtained in one unit could be applied in the other unit.	A merged unit has been created - *FBPOPR2XX3 Clean and sanitise food processing equipment* – which will be made available during Public Consultation phase 2 to gather feedback from stakeholders to determine whether there are two distinct job roles covered by the separate units, or if they can in fact be combined. It also should be noted that both of these units have high enrolments so this will need to be taken into consideration when making a final decision.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPOPR2070 Apply quality systems and procedures		
RTO – Vic	include in FBP3X120 Certificate III in Food Processing Group J or K	Unit added to elective bank of Certificate III in Food Processing (Group numbering has been updated)
FBPOPR2071 Provide and apply workplace information		
No feedback requiring action.		

AQF level 3

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPOPR3002X Prepare food products using basic cooking methods		
No feedback requiring action.		
FBPOPR3003X Identify cultural, religious and dietary considerations for food production		
Industry Association – National	If possible, I think it would be important to separate the competency FBPOPR3003X Identify cultural, religious and dietary considerations for food production as management of food allergy needs to be seen as something other than a lifestyle choice. Cultural and religious beliefs need to be taken seriously however those working in food service need to understand that food allergy is potentially life threatening and placement in the competency for those with lifestyle choices can wrongly imply that food allergy is a lifestyle choice, which it is not.	Unit not separated, but the unit has been reworked so that the emphasis is on dietary requirements, including life-threatening reactions (title, Elements, PE and KE flipped so that dietary requirements come first). PC2.2 added to place focus on life-threatening reactions. Anaphylaxis added to KE.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association – National	With regards to the FBPOPR3003X Identify cultural, religious and dietary considerations for food production unit of competency, consideration should be given to splitting into two units - one unit addressing food allergen management and a second unit addressing other special diets based on religious or cultural beliefs. This would allow appropriate focus and provision of information regarding the seriousness of food allergy, potentially health consequences if not appropriately managed and effective risk minimisation strategies that can be employed. This feedback was provided to the Skills IQ consultation regarding SITHCCC018 Prepare food to meet special dietary requirements in a consultation undertaken late last year.	Unit reworked to place emphasis on dietary needs (see comment above). Several new units now address food allergen management in food processing.
Industry Association – National	RE: Elements & Performance Criteria Suggested addition PC 3.4 - Identify allergen ingredients from food labels and Product Information Forms (PIFs).	Suggestion adopted
Industry Association – National	RE: Knowledge Evidence Suggested addition - • how to read food labels and PIFs to identify food allergens	Suggestion added to Foundation Skills field
Industry Association – National	RE: Knowledge Evidence 'key health and legal consequences'… allergens & anaphylaxis These should be treated as one and the same as any food allergy can potentially be life-threatening even if they have not had an anaphylaxis in the past	Suggestion adopted

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPOPR3X10 Operate and monitor an homogenising process	
No feedback requiring action.	
FBPOPR3X11 Operate and monitor a separation process	
No feedback requiring action.	
FBPOPR3X12 Operate and monitor a filtration process	
No feedback requiring action.	
FBPOPR3X13 Plan, conduct and monitor equipment maintenance	
No feedback requiring action.	
FBPOPR3X14 Receive and store raw materials	
No feedback requiring action.	
FBPOPR3X15 Operate a bulk liquid transfer process	
No feedback requiring action.	
FBPOPR3XX1 Load and unload tankers	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Tas	stay as Cert II	Input from Subject Matter Experts advises the unit is a clear fit with AQF3 because the work is often done independently (on farms etc.). Unit code remains at AQF3.
FBPOPR3XX2 Participate in sensory analyses		
No feedback requiring action.		
FBPOPR3XX4 Operate and monitor an extrusion process		
No feedback requiring action.		
FBPOPR3XX5 Operate interrelated processes in a production or packaging system		
RTO – Qld	I'm not too sure how this would work with people in the laboratory who test and receive samples. I am open to the unit but need some clarification for those who process the raw material into commercial products, e.g. sugar, and fruit juice	The qualification is targeted at operators, some who may choose to specialise in certain areas, but the focus remains on operators who run either production/processing or packaging lines. Those undertaking the specialisations, the 'Sales' specialisation for example, should still have skills and knowledge about processes (otherwise, Retail qualifications may be more suitable).
RTO – Vic	The combined OPR3XX5 unit is fine combined, but shouldn't be in the core – may not work for people doing hand packing work.	The qualification targets those who work in large processing sites, where hand packing may be done, but candidates at this level should still have skills and knowledge in these food processing or packaging systems. Note that one of the merged units is already core in current qualification.
Industry – Tas	Like the merged 'interrelated processes" unit – would like to see "monitor" added to the title as well	Suggestion adopted and unit title updated
FBPOPR3XX6 Operate and monitor a retort process		

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPOPR3XX7 Operate and monitor an evaporation process	
No feedback requiring action.	
FBPOPR3XX8 Operate and monitor a heat treatment process	
No feedback requiring action.	
FBPOPR3XX9 Operate and monitor a drying process	
No feedback requiring action.	

PPL – People, Planning & Logistics

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPPPL1XX1 Communicate workplace information	
No feedback requiring action.	
FBPPPL2XX1 Work in a socially diverse environment	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPPPL3001X Support and mentor individuals and groups	
No feedback requiring action.	
FBPPPL3002X Establish compliance requirements for work area	
No feedback requiring action.	

PBK – Production Baking

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPPBK2XX1 Operate a forming or shaping process	
No feedback requiring action.	
FBPPBK2XX2 Freeze and thaw dough	
No feedback requiring action.	
FBPPBK3XX1 Operate and monitor a cooling and slicing process	
No feedback requiring action.	
FBPPBK3XX2 Operate and monitor a pastry production process	

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action.	
FBPPBK3XX3 Operate and monitor a pastry forming and filling process	
No feedback requiring action.	
FBPPBK3XX4 Manufacture wafer products	
No feedback requiring action.	
FBPPBK3XX5 Operate and monitor a doughnut making process	
No feedback requiring action.	
FBPPBK3XX6 Make dough	
No feedback requiring action. Note this unit is being moved to a future project (see below).	

WHS – Work, Health & Safety

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
FBPWHS1001 Identify safe work practices	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – WA	Change PCs in Element 4 to read: 4.1 Identify workplace procedures for responding to incidents 4.2 Identify workplace procedures for emergencies (and leave out reference to First Aid, which is covered by different unit)	Suggestion adopted
RTO – WA	Remove reference in Knowledge Evidence to First Aid Suggest removing some other dot points in Knowledge Evidence (because the requirement is too much at AQF 1), including dot points that start: • General first aid • General workers compensation • WHS hierarchy of controls • WHS responsibilities of and rights…	Suggestions adopted
RTO – WA	Assessment Conditions – the first level dot point that states 'relationships' is weird – how can a relationship be a condition? Couldn't it just require the supervisor to be present?	The dot point is standard text in the Skills Impact template for units. It's intended to introduce the dot point/s below, so in this instance, what's required is that the candidate has interactions with team members. A note to help clarify this has been added to the Companion Volume Implementation Guide.
FBPWHS2001 Participate in work health and safety processes		
No feedback requiring action.		
FBPWHS3001 Contribute to work health and safety processes		
RTO – WA	Throughout unit, could 'work group' be changed to 'work team'? PC 1.4 Change work 'area' to work 'team' PE: remove 'development and' from 4th dot point	Suggestions adopted? *RE: AC comment -* The dot point is standard text in the Skills Impact template for units… it's intended to introduce the dot point/s below, so in this instance, what's required is that the candidate has interactions with team members. A note about this has been added to the CVIG.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
AC: use of 'relationships' is weird (see FBPWHS1001)	

Proposed units of competency for deletion

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPBEV2001 Operate a deaeration, mixing and carbonation process		
No feedback requiring action. Unit remains proposed for deletion.		
FBPBEV2002 Manufacture roast and ground coffee		
No feedback requiring action. Unit remains proposed for deletion.		
FBPBEV2003 Operate an ice manufacturing process		
No feedback requiring action. Unit remains proposed for deletion.		
FBPCON2001 Examine raw ingredients used in confectionery		
No feedback requiring action. Unit remains proposed for deletion.		
FBPDPR2001 Operate a butter churning process		
RTO – Tas	Don't delete these units	Unit updated to AQF3 and added as an elective in the Dairy specialisation of the Certificate III in Food Processing
FBPDPR2002 Operate a butter oil process		
RTO – Tas	Don't delete these units	Unit updated to AQF3 and added as an elective in the Dairy specialisation of the Certificate III in Food Processing

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
FBPDPR2004 Operate a cooling and hardening process		
No feedback requiring action. Unit remains proposed for deletion.		
FBPFAV2001 Apply hydro-cooling processes to fresh produce		
RTO – Qld	Don't delete these units	Unit updated and added as an elective to the Certificate II in Food Processing
FBPFAV3001 Conduct chemical wash for fresh produce		
RTO – Qld	Don't delete these units	Unit updated and added as an elective to the Certificate II in Food Processing
FBPFAV3002 Program fresh produce grading equipment		
RTO – Qld	Don't delete these units	Unit updated and added as an elective to the Certificate II in Food Processing
FBPGPS2005 Operate a fractionation process		
No feedback requiring action. Unit remains proposed for deletion.		
FBPGPS2010 Operate a winterisation process		
No feedback requiring action. Unit remains proposed for deletion.		
FBPGPS2011 Operate a creamed honey manufacture process		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – NSW	Don't delete these units	Unit updated and added as an elective to the Certificate II in Food Processing

FBPOPR2019 Fill and close product in cans

No feedback requiring action. Unit remains proposed for deletion.

FBPOPR2031 Operate a coating application process

No feedback requiring action. Unit remains proposed for deletion.

FBPOPR2047 Operate a portion saw

No feedback requiring action. Unit remains proposed for deletion.

FBPOPR2049 Operate a reduction process

No feedback requiring action. Unit remains proposed for deletion.

FBPOPR2051 Operate a spreads production process

No feedback requiring action. Unit remains proposed for deletion.

FBPOPR2053 Operate a washing and drying process

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
No feedback requiring action. Unit remains proposed for deletion.	
FBPOPR2054 Operate a water purification process	
No feedback requiring action. Unit remains proposed for deletion.	

4. General feedback/comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	We will start with the Food Processing sales, that is a course we are actively promoting, enrolments could be better. Our target audience is front of house retail sales in both bakeries and butchers shops. It can be a challenge selecting units from the electives to suit something that is retail sales orientated , I am not sure what the original intent of that qualification was, I have a feeling it was business selling to business, if it was, then I question the value of the qualification. If the intent was front of house retail, then there is value in the qualification. If it does go, but we have the option of a stream within food processing I don't see that as too big an issue. Would like to see it hang in for a few more years before its killed off.	Noted - the optional 'Sales' specialisation remains in the *Certificate III in Food Processing*

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	Cert 1, it's a great little course to get individuals work ready, the real sad part is its ratio of low hours versus funding. Would be great if someone could get behind it as a work ready program in the disability, disengaged, refugee, new arrival, return to work, English as second language sector. Its survival is funding dependant. There is nothing wrong with the course. Where I will see some screams if it disappears is with organizations where progression through the cert 1,2,&3 is linked to pay increases.	Due to feedback from a number of sources, the Certificate I will no longer be deleted. A draft Certificate I in Food Processing will be presented with Draft 2 of components.
RTO – Vic	Two groups of subjects I have a problem with are the cert 2 and 3 food safety. FDFFS2001A Implement the food safety program and procedures, FDFFS3001A Monitor the implementation of quality and food safety programs. They are that closely related that they can be put together as one unit. The same with cert 2 and 3 OH&S, FDFOHS3001A Contribute to OHS processes & FDFOHS2001A Participate in OHS processes, again they that closely related they could be one subject. If someone has done a cert 3 in either, I cannot see why they have to come back and do a cert 2. The learning material for both those units should come direct form both Worksafe and Food Standards Australia and New Zealand. As RTOS we keep reinventing the wheel with another book on these subjects when we should be being more sustainable. As a side issue cannot help but wonder what impact the workplace manslaughter law will have on OH&S training and assessment and if it ever gets linked to chain of responsibility.	The repetition between the qualifications has been removed - the AQF2 units included in the Certificate II and the AQF3 units included in the Certificate III (so fewer units overlapping).

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	Finally with any changes to food processing please do not allow the same scenario to occur with food processing as with bakery. In bakery we have two units that credit across.	Where a unit of competency is superseded and the workplace outcome of the unit has changed, the superseding unit must be deemed 'Not Equivalent'. The Training Package Products Policy 2019 details the process we must follow to determine equivalency. However, at this time the majority of units are currently mapped as 'Equivalent' but this could change if major changes are required in units that affect the workplace outcome.
Industry Association – National	I was quite disappointed that there wasn't any specific segments of the course covering packaging, other than one mention in the last line of one slide. So if there are packaging components in the current outline I'd be happy to give you feedback. In my 50 years in the food industry, so much of the FMCG Food processing activities has to be closely linked with the packaging's ability to ensure containment, protection, barrier, sealability of the product. All this has to also ensure that the production facilities proposed to process, fill and pack the product are all compatible with the product, packaging and processing to maximise production performance, quality and efficiency. From the Marketing, Sales and consumer perspective, product technologist need to clearly understand the customer and consumer packaging requirements and needs, very early in the designing of the product and processing to minimise delays and development costs.	An optional 'Bottling and Packaging' specialisation has been added to the Certificate III, and there are several packaging focussed units included in the elective bank of the Certificate II.
Industry Association – Qld	The model that would work well in attracting young people from school to the food processing industry is to have a Certificate II in Food Processing Pathways. This would serve two purposes. One is a Certificate II in Food Processing Pathways would	Assessment of most of the operational type units in the Certificate II will need to occur in a workplace, or in an environment that clearly reflects workplace conditions. This condition still applies to units delivered in school settings.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
provide entry level skills to the industry and be attractive to schools, and secondly stop schools from delivering the Certificate II in Food Processing that we would like to maintain exclusively for workers in the industry as an entry level traineeship.	Please note the Certificate I will no longer be deleted so the Certificate I in Food Processing will provide a pathway/introduction to work in food processing.
TAFE – NSW	RE: brewing units I agree with changing the levels for fermentation etc units to level 3. Also good that they don't need the identify key stages unit as a prerequisite. Also combining bright beer with filtration. I haven't seen anything I disagree with yet.	Great - thanks for the comment.
RTO – SA	I am happy with the changes that are proposed. Specifically, I agree that: 1. The two Cert II quals be merged 2. The two Cert III quals be merged 3. The Cert I qual be deleted I have looked through the food safety units as these are relevant to me and I am happy with their content other than to request that the term "HACCP" be replaced with the term "food safety program".	Great - thanks for the comment. The reference to 'HACCP' has been removed from *FBPEGG2001X* and changed where possible in other units. It remains in the Knowledge Evidence of 6 units - mostly higher level units. Title of *FBPFSY3002 Participate in a HACCP team* will remain as is (content is very related to HACCP) - this is an elective unit.
RTO – Vic	i. Use of Performance Evidence field The reduction in amended units of the mandated Performance Evidence is welcomed however the purpose of the PE field is not to precis the Performance Criteria. The purpose of this field is to document specific evidence that must be presented to an assessor. Best practice in unit development is to populate this field with such evidence where this is called for by industry / subject matter	Performance Evidence in all units reviewed to ensure the requirements of the Standards are met.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	experts. Providing a precis of the PCs does not add any value to units and can in fact cause ambiguity and confusion at training delivery where the summary contradicts the PCs. The Performance Evidence field must: • specify the required product and process evidence. • specify the frequency and/or volume of product/process evidence. • specify the relationship between the product and process evidence and the performance criteria.	
RTO – Vic	With reference to the third point above for some of the sampled units the relationship between the Performance Evidence and the Performance Criteria is unclear. For example in the unit FBPCON2XX1 Operate an enrobing process the Performance Evidence calls for evidence of; • "starting, operating, monitoring and adjusting enrobing process equipment to achieve required outcomes, including monitoring control points and conducting inspections as required to confirm process remains within specification, including: • supply of chocolate or compound to the enrobing reservoir • temperatures of chocolate or compound and pipelines • compound supply pump speed • curtain flow • blower and vibrator settings • chocolate or compound coverage • backing off and tailing • product weight • appearance	There are two PCs that refer to monitoring the process and the product: • 3.2 Monitor the process to confirm that specifications are met • 3.3 Identify, adjust and report out-of-specification equipment, product and process outcomes according to workplace requirements. The detail included in the PE is clearly linked. Performance Evidence in all units have been reviewed to ensure the requirements of the Standards are met.

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	• addressing routine processing issues." However there is no requirement under the Performance Criteria to 'monitor control points', or 'conduct inspections'. It is inappropriate to mandate the presentation of evidence for assessment that is not required under the Performance Criteria of the unit. The Performance Evidence in many of the sampled units does not meet the Standards for Training Packages. I request that all units are reviewed to ensure appropriate and compliant usage of this field.	
RTO – Vic	ii. Knowledge Evidence Some of the sampled units have very lengthy lists of knowledge. This may cause issues during training as every item listed must be reliably assessed. Reliable assessment requires assessment on a number of occasions and should be in a number of different ways to ensure compliance with the Rules of Evidence. As an example, for the unit FBPBPG3XX2 Operate and monitor a carbonated beverage filling process and assuming a bare minimum of two assessment instruments are used to assess the knowledge content, an assessor would be required to undertake approximately 48 assessment events for just this unit. This is excessive and not necessary to determine competency. I request that all units are further reviewed to ensure that only essential knowledge evidence is listed.	All Knowledge Evidence checked and noted as essential to the task described in the unit. Note that each knowledge evidence dot point does not require a separate assessment 'event'.

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RTO – Vic	iii. Foundation Skills Removal of the Core Skills for Work statements from the Foundation Skills field would appear to provide clearer guidance to trainers in terms of the essential Foundation Skills required as a component of competency.	Great - thanks for the comment
RTO – Vic	iv. Proposed unit deletions 20 units are proposed for deletion. I appreciate that the mandate from COAG is to delete where possible but I advise caution. Low enrolments do not necessarily indicate that particular skills and knowledge are not required. It may of course be that they are a niche requirement however they can still be critical skills and knowledge to the effective functioning of an industry sector. As we are all well aware it is very much more expensive and difficult to recreate units if they are needed than it is to delete them.	Some units proposed for deletion have been 'reinstated' after feedback from stakeholders.
RTO – SA	Some of our clients are micro-processors, and some of what we deliver doesn't quite fit in the Certificate II or Certificate III. The existing version of the Certificate III is flexible enough to suit niche delivery needed for SA micro-processors.	The target audience for the Certificate III is larger food processing sites, but there is no restriction for smaller sites if the qualification suits (and this will be noted in the Companion Volume Implementation Guide - please refer to supporting documents). Please note that several changes have been made to this second draft of the qualification.
RTO – SA	In the Foundation Skills in units - what is the difference between "digital" and "electronic"?	Not a lot of difference, but for clarity, 'electronic' has been removed from the 'writing' skill listed in the Foundation Skills field in all units.
RTO – Qld	Please keep [accredited course] front of mind as I am now in the process of re-accrediting it again. The course is more than adequate and equal to any fresh produce food safety training in Australia	With regards to including your course as an equivalent to any fresh produce food safety training in Australia, although this may be common practice for training providers, it is not something Skill Service Organisations can do as we are bound by the Standards for Training Packages whereby

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so let me know if you wish to include it in equivalents.	equivalency for qualifications are only mapped against nationally endorsed qualifications.
Industry Association – National	Where possible throughout the competencies, food allergy management be clearly noted as part of food safety so that it is not seen as something separate. Food safety must include food allergy and be given equal weighting to other causes of food born illness.	Yes - wherever possible, 'food safety risks' have been updated to include allergens and allergic reactions (especially the FSY units).
Industry Association – National	[We] also disagree with the term cross contact. We do not speak about salmonella cross contacting salad, for example, we clearly refer to cross contamination. The food service industry understands what cross contamination is and take it seriously. We need that same seriousness to be taken with cross contamination of food allergens which are potentially life threatening. The term cross contact implies it is not as serious as cross contamination and different terminology can lead to confusion. Anaphylaxis can be immediately life threatening if someone eats even a small amount (trace) of the allergen so the term cross contamination should be used.	OK - the term 'cross contamination' was updated in the first draft to be 'cross contact' but based on this and other feedback (below) and rationale, it has reverted back to 'cross contamination'.
Industry Association – National	With regards to the documents listed below, we do not have any specific wording changes, however it is important to ensure that food allergen examples are used in delivering these competency units and skill sets. • FBPFSY5XX3 Plan to mitigate food fraud • FBPSSXXXX02 Check traceability of food products	Noted - this will be added to the CVIG

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Industry Association – National	In addition to the [specific] feedback provided, we would also like to provide the following overarching feedback: • The inclusion of allergens across these competency units and skill sets has been well considered, including the addition of new allergen management competency units and skill sets. • There needs to be cultural shift in what food safety encompasses. Typically, food allergen management has not been considered part of food safety. As these competency units and skill sets are now starting to include food allergen management in food safety, we need to be clear in our communication that this is the case. Initially, it is important to specify this.	Thanks for the comment. This information will also be added to the CVIG.
Industry Association – National	The term cross contact has been used in place of cross contamination when referring to allergens. For consistency, we believe the term cross contamination should be used as this is the term people are familiar with when referring to microbial cross contamination. It is important that staff understand that cross contamination of food allergens can occur in a similar way to microbial cross contamination. There is the risk of confusion if we are using a different term for food allergens. Therefore, for consistency of terminology and to avoid confusion, we suggest using the term cross contamination for food allergens.	OK - the term 'cross contamination' was updated in the first draft to be 'cross contact', but based on this feedback and rationale, it has reverted back to 'cross contamination'.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – WA	Some of the generic wording in units is too generic and makes it hard for them to be delivered/assessed without covering everything. Also and and/or or. OR is fine, AND is 2 questions.	Noted and addressed in draft units.
Industry – SA	We like that traceability reporting was added to all units.	Great - thanks for the comment.
RTO – SA	Like the change that has been made where "confirm requirements of job task" is used instead of "read and listen to work instructions from supervisor".	Great - thanks for the comment.
RTO – Qld	Mass balance – have to account for every bit of packaging used on the line in the day - what was wasted, reused, etc. Would be at Cert III operator level	Reference to mass balance added to 'traceability units '*FBPFSY3XX2 Participate in traceability activities'* and '*FBPFSY4XX4 Conduct a traceability exercise'*
RTO & Industry – Qld Industry Association – National	Adding "digital skills" to Foundation Skills section in units is good, as is inclusion of GMP in units.	Great - thanks for the comment
Industry Association	We have a problem with conditions around assessment. As an association we want to dramatically increase performance to reflect a processing environment – we do not want people to be able to do these units "at home".	The wording of Assessment Conditions could be changed to include something like 'this unit must be assessed in at a premises licenced to process food', but that would make assessment difficult for some RTOs, especially those that have established top class training and assessment venues. Assessment conditions have been revised to include the point that assessment of skills must be carried out in a food processing workplace (or a food packaging workplace, or whichever context is relevant), or a workplace that reflects real workplace conditions. Content about what constitutes 'real workplace conditions' will be added to the CVIG.

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Industry & RTOs & Industry Associations – Vic	Food processors are required to go through a GMP unit for food fresher training (with Coles/Woolworths). There is a unit at Cert III level in FBP but it is for pharmaceutical and not suitable for food. If there was a GMP unit for food at this level it would meet this need. This food-based GMP unit would be more suitable as a core unit than any other. Could also be part of a skill set	Two new GMP units have been developed and included in the core of the Certificate II and Certificate III
RTO – Vic	RE: adjustment of AQF alignment of units This has big impact on awards – if were Cert II as Operator, saying it's now a Cert III which has an impact. There are going to be difficulties with unions and awards etc. Big cost impact if businesses have to pay operators at Cert III level (where previously was Cert II). This is where skill sets can be important, too. Full qualification brings in a cost factor to the business.	Yes - the development team members and the IRC are aware of the implications – and monitoring the feedback that is still coming in on this issue. Currently the unions are very supportive of the proposed changes, as are many employers and consultation on this matter will continue. Please note the additional (introductory) skill sets that have been developed with this version of components *FBPSSXXXX03 Food processing induction* and *FBPSSXXXX04 Introduction to food processing*
RTO – Vic	RE: adjustment of AQF alignment of units We have found the units have been at a 2 but should be a 3 and haven't been eligible for funding and now could be.	OK - thanks for the feedback
RTO – Vic	RE: FBPOPR1010 Carry out manual handling tasks Industry deem unit to be critically important and don't see it as a level 1 unit. This unit should be AQF 2 Would also support "Pack/unpack unit" to be AQF 2 Gives learners a better understanding of the why	The unit code for *'Carry out manual handling tasks'* has been updated to AQF2 to match the content of the unit. *FBPBPG1XX1 Pack or unpack product manually* remains at AQF1 where there is a clear link to the descriptors at that level in the AQF.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	and a deeper understanding of these units. Industry want this to minimise risk.	
RTO – Vic	RE: use of the term "batch" in Performance Evidence of some units What is a "batch?" – very grey area. This is very problematic. Maybe a time frame duration One "lot" instead of "batch" – "batch" is a specific term that could run for 12 hours?	Additional advice has been developed for the CVIG, clarifying requirements for assessment around 'one batch' - please refer to support materials.
Industry – Tas	People currently doing the Cert II would be doing units that have now been recoded to Cert III – if equivalent, are they now doing Cert II or III? What does it align to?	Additional advice has been developed for the CVIG, clarifying the requirements for updating enrolments - please refer to support materials.
Industry – Tas	Agree with the changes made to the sample unit shown in the workshop to demonstrate how units reflect an AQF level 3 (instead of 2), and agree that these units should be AQF 3.	Great - thank you for the comment
Industry – Tas	RE: Use of the term "batch" in Performance Evidence of some units I like this wording	Great - thank you for the comment
Industry/Union – Vic	RE: Use of the term "batch" in Performance Evidence of some units "batch" in units works well, but do have concerns with people delivering to "simplest" option for a batch.	Additional advice has been developed for the Companion Volume, clarifying requirements for assessment around 'one batch' - please refer to support materials.
RTO – NSW	RE: Use of the term "batch" in Performance Evidence of some units to complete one batch I believe is not sufficient to demonstrate competence unless there is a third	Additional advice has been developed for the Companion Volume, clarifying requirements for assessment around 'one batch' - please refer to support materials.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	party support saying the work has been completed over time.	
RTO – NSW	I notice some of the flour milling units have been removed [from the Certificate III]. I understand that the complexity of the FBPGRA3003 & FBPGRA3004 units but it would be good to have a broader more appropriate AQF3 level unit that did not involve leadership or management. Perhaps 'Operate a flour milling operation' be included at this level. A number of larger businesses have several sections in their facilities from flour to confectionary, sugar etc. A basic understanding would be helpful at this level.	A number of Flour Milling (and Production Baking) units have been moved out of this Food Processing project and into upcoming projects specific to those sector areas. Please refer to the section below for further information.
Industry – National	Food safety needs to be taught in conjunction with relevant skill modules - the manner of on-site training and employee engagement starts with teaching a basic skill - food safety needs to be ingrained at this level.	Yes - agreed. All operational units reference food safety - usually in the Performance Criteria, Performance Evidence and Knowledge Evidence.
RTO – National	There is an increase demand to packaging units, mainly from organisations similar to what lite and easy does.	An optional Bottling and Packaging specialisation has been added to the Certificate III, and there are several packaging units included as electives in the Certificate II.
Union – National.	Extract from email: Food and beverage workers are skilled workers. Workers in this essential industry should be given the opportunity to obtain qualifications and progress through classifications in the course of their employment. It is the general view of the [union] that classifications should not be simplified any further. Classifications should be based on length of service, skill set and responsibility, with applicable allowances.	Noted – thank you for the feedback. The pathway for the Food Processing qualifications will remain as is and include Certificate I, Certificate II and Certificate III.

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Qualification consolidation for the purposes of low enrolment rates are reasonable. However, when reviewing qualifications against the AQF, any adjustment should be seriously considered with regard to the effect it may have on the Award. Thank you for the opportunity to provide general feedback during the processing project. Should you require any further information or submissions from us please don't hesitate to contact me.	

5. Units of competency that have been moved to other projects

Some units of competency included in the original scope of this project are being moved into upcoming projects. Section C of the recently submitted *FBP IRC Skills Forecast 2020 Annual Update* lists two new projects:

- Flour Milling (to review Certificate IV in Flour Milling)
- High Volume Production Baking (to review Certificate III in Plant Baking).

These upcoming projects include units of competency specific to their sectors. However, there are also some units in the current Food & Beverage Processing project that are also specific to these same sectors.

Subject Matter Expert feedback received has suggested possible changes to units in the Flour Milling and Production Baking that are out of scope of the current project or require more targeted consultation and would be more suitable for inclusion in the future projects.

Therefore, please note the following units currently in the Food & Beverage Processing project have been moved to be reviewed further during a relevant future project, as outlined in the table below.

Unit of competency	Future project to be moved to
FBPGRA2002 Recognise mill operations and technologies	Flour Milling
FBPGRA2005 Operate a purification process	Flour Milling
FBPGRA2007 Operate a scratch and sizing process	Flour Milling
FBPGRA2008 Operate a break roll process	Flour Milling
FBPGRA3003 Lead flour milling shift operations	Flour Milling
FBPGRA3004 Control mill processes and performance	Flour Milling
FBPPBK2001 Operate a cooling and slicing process	High Volume Production Baking

Unit of competency	Future project to be moved to
FBPPBK2002 Operate a pastry forming and filling process	High Volume Production Baking
FBPPBK2003 Manufacture rye crisp breads	High Volume Production Baking
FBPPBK2004 Manufacture wafer products	High Volume Production Baking
FBPPBK2005 Operate a doughnut making process	High Volume Production Baking
FBPPBK2006 Operate a griddle production process	High Volume Production Baking
FBPPBK2007 Operate a pastry production process.	High Volume Production Baking