

Animal Reproduction Project

Summary of Feedback, Responses and Actions



5 March 2021

Draft qualifications and units of competency for the Animal Reproduction project were made available on the [Skills Impact website](#) for stakeholder review from 2 December 2020 to 28 February 2021. 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, face-to-face webinars, phone and email:

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

*TAS Industry is represented on the Subject Matter Expert Working Group (SMEWG) but did not provide direct feedback during this consultation phase.

Feedback received during the 'Drafts Available' period for the qualifications and units of competency that have been developed for Animal Reproduction project has been positive, with minor changes or updates suggested by stakeholders.

The Industry Reference Committee (IRC) sought stakeholder feedback via a questionnaire from 15 March to 15 April 2021, regarding the following components with low/no enrolments.

- *AHC50216 Diploma of Pork Production*
- *AHCAIS301 Collect semen*
- *AHCAIS302 Process and store semen*
- *AHCAIS401 Supervise artificial breeding and embryo transfer programs*
- *AHCLSK302 Mate and monitor reproduction of alpacas*
- *AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle*
- *AHCLSK507 Plan, monitor and evaluate strategies to improve livestock through genetics*
- *AHCPLY301 Artificially inseminate poultry*

A summary of feedback received from this questionnaire and the IRC decision regarding these components is included on page 38 of this report.

Below is a summary of the feedback raised for the draft qualifications and units of competency developed and reviewed for the Animal Reproduction 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 SMEWG process. Resolutions are constructed to consider the needs and views of stakeholders to the extent possible, and to comply with the *Standards for Training 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, AQF – Australian Qualifications Framework

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Summary of feedback on draft qualifications

AHC3XX21 Certificate III in Agriculture (Dairy Production)

General Qualification comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO, VIC	Re mapping table: AHCLSK3XX core unit not equivalent therefore occupational outcome of qualification has changed. Mapping table requires amendment NOT EQUIVALENT	Thanks for your feedback, mapping changed to 'Not equivalent'.

Comments related to Core Units

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO, NSW	AHCCHM303 was superseded by AHCCHM307 (17th Dec 2018)	Thanks for your feedback, changed <i>AHCCHM303 Prepare and apply chemicals</i> to <i>AHCCHM307 Prepare and apply chemicals to control pest, weeds and diseases</i> .

AHC30416 Certificate III in Pork Production

General Qualification comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO, VIC	Need to amend mapping table information - the packaging rules core units have not changed (occupational outcome has not changed).	Thanks for your feedback, qualification mapping information states 'Amended packaging rules, updated elective units', 'Equivalent'.

AHC30516 Certificate III in Poultry Production

General Qualification comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO, VIC	Need to amend mapping table information - the packaging rules core units have not changed (occupational outcome has not changed).	Thanks for your feedback, qualification mapping information states 'Amended packaging rules, updated elective units', 'Equivalent'.

AHC50216 Diploma of in Pork Production

General Qualification comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO, VIC	Need to amend mapping table information - the packaging rules/core units have not changed if LSK505 Release 2 is equivalent (occupational outcome has not changed).	Thanks for your feedback, qualification mapping information states 'Amended packaging rules, updated elective units', 'Equivalent'.

Summary of feedback on draft Units of Competency

Revised units of competency

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
AHCAIS2XX Assist with artificial insemination procedures (formerly AHCAIS201 Assist with artificial insemination procedures)		
<ul style="list-style-type: none"> Industry Association, National 	PC1.2 deleted - not applicable to deer farming	Thanks for your feedback, PC 1.2 deleted and renumbered PC's that follow.
<ul style="list-style-type: none"> RTO, VIC 	No issues reads well	Thanks for your feedback, your support is noted.
<ul style="list-style-type: none"> RTO, VIC 	All good no issues or queries	Thanks for your feedback, your support is noted.
AHCAIS301 Collect Semen – Unit to be deleted		
<ul style="list-style-type: none"> Industry Association, National 	No comments on draft unit - seems very good	Thanks for your feedback, your support is noted.
<ul style="list-style-type: none"> RTO, VIC 	Reads well - note addition of PE frequency (2) could affect hours for delivery (Eq). Can anyone comment on this??	Thanks for your feedback, your support is noted. The hours for delivery are outside the scope of an SSO and is one of the roles of the Curriculum Maintenance Manager in Victoria to work out once the components are endorsed and live on training.gov.au. Please speak to the CMM for further clarification on this matter.
<ul style="list-style-type: none"> Industry, National 	Any electro-ejaculation must be under vet supervision due to animal welfare concerns	Thanks for your feedback, electro-ejaculation is in the knowledge evidence only (i.e. it is not in the performance evidence). This means that they will be taught and assessed on their knowledge of semen collection methods (electro-ejaculation and artificial vagina). They are also taught and assessed on their knowledge of animal welfare legislation, codes of practice, etc. relevant to the collection of semen.
AHCAIS302 Process and store semen – Unit to be deleted		
<ul style="list-style-type: none"> Industry Association, National 	No comments on draft unit - seems very good	Thanks for your feedback, your support is noted.
<ul style="list-style-type: none"> RTO, VIC 	The unit is process and store semen. The word store is missing from the elements and Performance Criteria. Should element 5 be <i>Prepare</i>	Thanks for your feedback, following changes made to the unit: changed element 5 to 'Prepare and store semen doses' changed PC 5.4 to 'Store semen doses in temperature control equipment' added new PE, 'handled and stored semen'

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<i>and store semen?</i> PE does not mention storage. Suggest revise unit to clarify	changed PE 'dispensed, prepared and labelled semen doses' to 'dispensed, prepared, labelled and stored semen doses' changed KE 'requirements and methods for the disposal of semen' to 'requirements and methods for the handling, storage, and disposal of semen'
• RTO, VIC	No mention in PE of how/where semen is stored, while KE mentions store and PC 5.4 place in temperature control environment. Use of the word dispensed?? Should be prepared, labelled and stored semen doses?? Re Prepare semen doses 5.1 - should this be prepare and store semen doses??	Thanks for your feedback, following changes made to the unit: changed element 5 to 'Prepare and store semen doses' changed PC 5.4 to 'Store semen doses in temperature control equipment' added new PE, 'handled and stored semen' changed PE 'dispensed, prepared and labelled semen doses' to 'dispensed, prepared, labelled and stored semen doses' changed KE 'requirements and methods for the disposal of semen' to 'requirements and methods for the handling, storage, and disposal of semen'
AHCAIS303 Artificially inseminate livestock		
• Industry Association, National	Performance Evidence point: deleted 'observed animals on heat to detect correct insemination timing' - not applicable to deer farming	Thanks for your feedback, removed PE 'observed animals on heat to detect correct insemination timing'.
• RTO, VIC	Suggest removing reference to codes of practice and industry standards from Performance Evidence 2.1. The standards and codes of practice are included in the Knowledge Evidence and Assessment Conditions. Organisations conducting a course on using semen require Artificial Breeding Training Approval in Victoria through ABLIS < https://ablis.business.gov.au/service/vic/artificial-breeding-training-approval/34944 >. The Animal Welfare Victoria Code of Accepted Farming Practice for the welfare of Cattle states that: Artificial insemination of cattle should be performed only by a veterinarian or trained artificial inseminator. Should there be a statement around that requirement? There may be difficulties for RTOs to deliver this unit due to animal ethics/number of animals required (10 per student).	Thanks for your feedback, following changes made to the unit: changed PC 2.1 to 'Select, prepare and thaw semen' (removed 'according to codes of practice and industry standards') The unit application states 'Accreditation requirements apply in some jurisdictions to performing commercial artificial insemination. Users are advised to check with the relevant State or Territory regulatory authority'
• RTO, VIC	Re PE - Ten occasions could be deemed excessive use. Must consider, number of animals available, and the number of students to complete a frequency of 10 occasions. Possible combinations have potential to result in excessive use and	Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this units PE, with the following advice being provided: Ten occasions was the agreed frequency of the SMEWG, change to 'artificially inseminated at least ten separate animals with an accuracy of over 85 percent and has:'.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	welfare concerns. Ag Vic license Use of animals for teaching purposes and it comes under the RTO's Animal Ethics Committee (AEC).If current approval stipulates frequency then RTO needs to apply for new approval and AEC may not grant if they deem frequency excessive?? Therefore, potentially cannot meet PE requirements. Also change in frequency potential to impact delivery hours unit deemed (Eq).	
• RTO, VIC	Re PE 10 occasions - I agree but we need to be careful of animal ethics and cow use	
• RTO, VIC	Re PC 3.2 Supply information to relevant authorities – With our new dairy central data base, it would be good to have a dummy model that could be used by students to enter data into. If we could also get a beef data base, we could cover all cattle	Thanks for your feedback, your comments have been noted.
• RTO, VIC	Re PC 2.1 ...codes of practice and industry standards Is there a recommendation as to the code of practice or industry standard to be used. I will be writing a code of practice for a Dairy Australia/NHIA Fertility Working group that is in the process of developing national standards for AI in cattle	Thanks for your feedback, following changes made to the unit: changed PC 2.1 to 'Select, prepare and thaw semen' (removed 'according to codes of practice and industry standards')
AHCAIS401 Supervise artificial breeding and embryo transfer programs		
• Industry Association, National	PC 3.1 deleted - not applicable to deer farming	Thanks for your feedback, PC 3.1 deleted and renumbered PC's that follow.
• Industry, National	Re unit in general - comments against Element 2 Need to add according to veterinary prescription as these hormone drugs would be S4 Under some state's Veterinary Surgeon's legislation this is a job for a vet. Comment against Performance Evidence general – ET would be supervised by the vet performing the work so don't see how the student can be certified as supervising the vet.	Thanks for your feedback, following changes made to the unit: changed PC 2.7 to 'Provide hormone injections to intended recipients or donors at appropriate stages of transfer programs where ET is the selected option according to veterinary prescription': changed the unit application to: 'This unit of competency describes the skills and knowledge required to determine livestock breeding method, and supervise, monitor and maintain livestock artificial breeding and embryo transfer (ET) programs. The unit applies to individuals who apply specialist skills and knowledge to supervise livestock artificial breeding and embryo transfer programs. This

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
		<p>includes applying and communicating non-routine technical solutions to predictable and unpredictable problems.</p> <p>All work must be carried out to comply with workplace procedures, health and safety in the workplace requirements, animal welfare legislative, regulatory and codes of practice requirements, and sustainability and biosecurity practices.</p> <p>Accreditation requirements apply in some jurisdictions to performing commercial artificial breeding and embryo transfer. Users are advised to check with the relevant State or Territory regulatory authority.'</p>
<ul style="list-style-type: none"> RTO, VIC 	<p>Re Application first paragraph Specific to livestock and not other animals, as per KE Agree with 317 (Re unit in general) where does the Veterinarian supervision fit in</p>	<p>Thanks for your feedback, following changes made to the unit: changed PC 2.7 to 'Provide hormone injections to intended recipients or donors at appropriate stages of transfer programs where ET is the selected option according to veterinary prescription': Unit and assessment requirements content updated throughout to reflect 'livestock'.</p>
<ul style="list-style-type: none"> RTO, VIC 	<p>Re KE 'anatomy and physiology of female livestock – Full anatomy and physiology or just reproductive?</p>	<p>Thanks for your feedback, following changes made to the unit: reproductive physiology already listed in KE, removed KE 'anatomy and physiology of female livestock'.</p>
AHCLSK203 Carry out birthing duties		
<ul style="list-style-type: none"> Industry Association, National 	<p>deleted PC1.3 'Prepare and use birthing...' - not applicable to deer farming. Performance Evidence: deleted the following as not applicable to deer farming: 'prepared birthing environment...to industry standards' 'provided a non-threatening...post birthing' 'maintained a safe and secure...environment' 'selected birthing...for operation' Knowledge Evidence: deleted the following as not applicable to deer farming: 'birthing equipment and...functions' Assessment Conditions: deleted the following as not applicable to deer farming: 'materials, equipment, and...out birthing duties'</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this unit, with the following advice being provided: PC 1.3: Remove 'birthing' from PC, i.e., 'Prepare and use equipment, resources and materials according to supervisors' instructions and safe working practices' PE: Change 'prepared birthing environment, materials and resources to industry standards' to 'prepared environment, materials and resources to industry standards' Change 'provided a non-threatening environment and access to adequate feed and water immediately post birthing' to 'provided a non-threatening environment and access to appropriate feed and water' Change 'maintained a safe and secure post-birthing environment' to 'maintained a safe and secure environment' Change 'selected birthing equipment and materials and checked for operation' to 'selected equipment and materials and checked for safe operation' KE: Change 'birthing equipment and materials, their components and functions' to 'equipment and materials, their components and functions' AC:</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
		Change 'materials, equipment, and resources applicable to carrying out birthing duties' to 'materials, equipment, and resources applicable to carrying out birthing duties for the animal species'
• RTO, VIC	Re KE 'appropriate use of antibiotics...after birthing' The words appropriate use seem incomplete. Knowledge of dosage, delivery routes, contraindications. safe and humane medication delivery routes and contraindications	Thanks for your feedback, following changes made to the unit: changed KE 'appropriate use of antibiotics and other medicine after birthing' to 'use of antibiotics and other medicine after birthing, including dosage, delivery routes and contraindications'.
• RTO, VIC	PC3.2 new and administration of medication requires knowledge of safe routes of delivery and contraindications. Person is working under supervision and administering as directed, so assume they are not making the decision on dosage and selection of appropriate medication??? Is unit Equivalent?	Thanks for your feedback, following changes made to the unit: changed unit code to AHCLSK2XX, unit not equivalent. changed KE 'appropriate use of antibiotics and other medicine after birthing' to 'use of antibiotics and other medicine after birthing, including dosage, delivery routes and contraindications'. The administration of antibiotics or medicine is as directed, they are not required to make a decision on dosage or selection of medication.
• Industry Association, WA	PC 1.2 Monitor what? Imminent seems a bit immediate, this action could occur in the days leading up to birth (the moment of birth is not known prior - unless caesarean). Should sentence be: Check health condition and monitor health status of pregnant animal prior to birthing.	Thanks for your feedback, following changes made to the unit: changed PC 1.2 to 'Check and monitor condition and health status of pregnant animal prior to birthing'.
• Industry Association, WA	PC1.4 replace 'severe' with 'adverse' PC 2.1 replace 'ensure' with 'assess whether birth is progressing normally' PC2.2 This should be done at stage 1! PC 3.1 '...health and bonding...' Add 'and suckling' PC 3.1 - there is often (but not always) a need to clean the mother and newborn/s. PC3.1 - There is often a need to ensure that the newborn starts breathing by stimulating the lungs and/or clearing the airways. For some animals (e.g., horses) it is also to stand.	Thanks for your feedback, following changes made to the unit: changed PC 1.4 to 'Provide shelter access for birthing females to ensure animal welfare needs are met' changed PC 2.1 to 'Monitor environment and animals to assess whether birth is progressing normally' moved PC 2.2 to Element 1 PC 1.8 and renumbered PC's effected in element 2 added new PC 3.1 'Check and clear newborns airways where required' added new PC 3.2 'Clean mother and newborn where required' renumbered PC 3.1 to 3.3 and changed to 'Monitor post-birthing health, suckling and bonding of female and newborn' renumbered remaining PC's in element 3.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<ul style="list-style-type: none"> Industry Association, WA 	<p>PE - 'on at least one occasion' one occasion hardly seem to show competence across the range of situations that can occur. surely, at least 3 occasions in different locations or with different breeds or at different times.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this units PE, with the following advice being provided: Change to 'at least three separate occasions'.</p>
<ul style="list-style-type: none"> RTO, VIC 	<p>Agree re PC1.2, 2.1 , 2.3 (check of document suggests stakeholder means PC2.2 here - e.g., agrees with feedback that 2.2 should be done at stage 1 {Element 1}) PC 1.4 why severe or adverse, maybe other reasons for need of shelter not related to weather?? Provide shelter access for birthing females to ensure animal welfare needs are meet?</p>	<p>Thanks for your feedback, following changes made to the unit: changed PC 1.2 to 'Check and monitor condition and health status of pregnant animal prior to birthing' changed PC 1.4 to 'Provide shelter access for birthing females to ensure animal welfare needs are met' changed PC 2.1 to 'Monitor environment and animals to assess whether birth is progressing normally' moved PC 2.2 to Element 1 PC 1.8 and renumbered PC's effected in element 2 added new PC 3.1 'Check and clear newborns airways where required' added new PC 3.2 'Clean mother and newborn where required' renumbered PC 3.1 to 3.3 and changed to 'Monitor post-birthing health, suckling and bonding of female and newborn' renumbered remaining PC's in element 3.</p>
AHCLSK208 Monitor livestock to parturition		
<ul style="list-style-type: none"> Industry Association, National 	<p>Deleted PC2.1 'Identify animals...pregnancy status' Knowledge Evidence: Deleted 'housing requirements for intensively produced animals' as not applicable to deer farming</p>	<p>Thanks for your feedback, following changes made to the unit: changed PC 2.1 to 'Identify animals and separate on basis of pregnancy status where applicable' removed KE 'housing requirements for intensively produced animals'.</p>
AHCLSK302 Mate and monitor reproduction of alpacas – Unit to be deleted		
<ul style="list-style-type: none"> Industry, National 	<p>Typo - change 'pigs' to 'alpacas' The term 'oestrus' is not appropriate in this species What resources are students given when enrolling in this subject to ensure they are given correct information rather than anecdotal drivell?'</p>	<p>Thanks for your feedback, following changes made to the unit: Second paragraph of application changed to 'The unit applies to individuals who mate alpacas and monitor hembra performance under broad direction, and take responsibility for their own work.' Changed PE from 'recognised ovulation and detected oestrus in females' to 'recognised ovulation in females' These units of competency are standards that Registered Training Organisations (RTOs) must train and assess against. RTOs develop their own resources to train and assess the students. RTOs do have rules that they must comply with, including having trainers/assessors who have current and relevant industry experience, and they are audited regularly.</p>
<ul style="list-style-type: none"> RTO, VIC 	<p>Revise second paragraph in Application (refers to pigs)</p>	<p>Thanks for your feedback, following changes made to the unit: Second paragraph of application changed to 'The unit applies to individuals who mate alpacas and monitor hembra performance under broad direction, and take responsibility for their own work.'</p>
AHCLSK312 Coordinate artificial insemination and fertility management of livestock		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<ul style="list-style-type: none"> Industry Association, National 	PC3.2 deleted 'Monitor female livestock...to oestrus' - not applicable to deer farming Performance Evidence: deleted 'detected females in oestrus' - not applicable to deer farming	Thanks for your feedback, need to check with SME WG regarding feedback on PC 3.2 and PE, with the following advice being provided: PC 3.2 reads 'Monitor female livestock for signs of early abortion <u>or</u> return to oestrus', keep as is. Changed PE from 'detected females in oestrus' to 'detected signs of early abortion or return to oestrus'
<ul style="list-style-type: none"> RTO, VIC 	Is there some crossover with AHCAIS401?	Thanks for your feedback, AHCAIS401 covers the supervision of AI and ET programs, whereas AHCLSK312 is the coordination and facilitation of AI and fertility management of livestock.
<ul style="list-style-type: none"> RTO, VIC 	Re PC 2.1 'oestrus inducement' - Being a performance criteria this will need to be observed. Animal ethics require animals only to be treated if necessary. Under a training situation this can be difficult. An on farm visit to observe will be unsustainable. Need to add WHS in this clause due to dangers of PG on certain people Re PE 'sterilised equipment...insemination procedures' - Comment is 'we do not sterilise equipment, but we do clean and use in a hygienic manner'	Thanks for your feedback, advice from the SMEWG was sought regarding feedback on PC 2.1 of this unit, with the following advice being provided: Animal ethics relates to teaching and research. There are a number of other means than PG, i.e.; introduction of male animals, flushing, grouping animals, etc. PC 2.1 to remain as is. following changes made to the unit: changed PE from 'sterilised equipment and prepared hygienic worksite prior to insemination procedures' to 'cleaned equipment and prepared hygienic worksite prior to insemination procedures'.
AHCLSK314 Prepare animals for parturition		
<ul style="list-style-type: none"> Industry Association, National 	PC2.3 deleted 'Implement environ....production activities - not applicable to deer farming	Thanks for your feedback, following changes made to the unit: removed PC 2.3.
<ul style="list-style-type: none"> Industry, National 	Re Applications 3rd paragraph - ...codes of practice... - in particular, the risks associated with Q fever Assessment Conditions re workplace requirements - in particular, Q Fever.	Thanks for your feedback, following changes made to the unit: Third paragraph of application changed to 'All work must be carried out to comply with workplace procedures, health and safety in the workplace requirements, animal welfare legislative, regulatory and codes of practice requirements in particular the risks associated with Q fever, and sustainability and biosecurity practices.' PE changed from 'applied relevant workplace health and safety and environmental and biosecurity legislation, regulations and workplace procedures.' to 'applied relevant workplace health and safety and environmental and biosecurity legislation, regulations and workplace procedures, including Q fever.' KE changed from 'workplace requirements applicable to health and safety in the workplace for preparing animals for parturition' to 'workplace requirements applicable to health and safety in the workplace for preparing animals for parturition, including Q fever'

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
		AC changed from 'workplace requirements applicable to health and safety in the workplace for preparing animals for parturition' to 'workplace requirements applicable to health and safety in the workplace for preparing animals for parturition, including Q fever'
AHCLSK315 Prepare for and implement natural mating of livestock		
• Industry Association, National	No comments on draft unit - seems very good	Thanks for your feedback, your support is noted.
AHCLSK3XX Implement procedures for calving (formerly AHCLSK329 Implement procedures for calving)		
• RTO, VIC	Re PC3.3 - '...undue harm to the female...' add 'and unborn calf'	Thanks for your feedback, following changes made to the unit: changed PC 3.3 to 'Use calving ropes and calf pulling equipment where required, without causing undue harm to the female and unborn calf'.
• Industry Association, WA	RePC3.5 Handle livestock...- This is not a task, but a condition. Combine with PC3.1? Re PC 4.2 Check calves... List this first as 4.1 Should be: check that calves have clear airways and commence breathing, and clear airways as required. Nothing here about checking that newborn is able to stand and commences suckling.	Thanks for your feedback, following changes made to the unit: changed PC 3.1 to 'Handle calving cows calmly and put in a secure environment according to workplace animal welfare practices', and removed PC 3.5: moved PC 4.2 to 4.1 and changed to 'Check that calves have clear airways and commence breathing, and clear airways where required', and renumbered PC's effected by change.
• Industry, National	Re Performance Evidence 'applied workplace animal welfare practices' - Comment is: If assisting at calving's will most likely be exposed to Q Fever so should be vaccinated after skin and blood testing. Q Fever should be mentioned. Treatment post calving would be an act of vet science	Thanks for your feedback, following changes made to the unit: Third paragraph of application changed to 'All work must be carried out to comply with workplace procedures, health and safety in the workplace requirements, animal welfare legislative, regulatory and codes of practice requirements in particular the risks associated with Q fever, and sustainability and biosecurity practices.' PE changed from 'applied relevant workplace health and safety and environmental and biosecurity legislation, regulations and workplace procedures.' to 'applied relevant workplace health and safety and environmental and biosecurity legislation, regulations and workplace procedures, including Q fever.' KE changed from 'workplace requirements applicable to health and safety in the workplace for implementing procedures for calving, including appropriate use of personal protective equipment (PPE)' to 'workplace requirements applicable to health and safety in the workplace for implementing procedures for calving, including Q fever and appropriate use of personal protective equipment (PPE)' AC changed from 'workplace requirements applicable to health and safety in the workplace for implementing procedures for calving' to 'workplace

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
		requirements applicable to health and safety in the workplace for implementing procedures for calving, including Q fever'
AHCLSK3XX Conduct dropped ovary technique procedures for spaying cattle (formerly AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle)		
<ul style="list-style-type: none"> Industry Association, WA 	<p>AHCLSK335 Conduct dropped ovary technique producers for spaying cattle</p> <p>The Board is deeply concerned about the animal welfare implications of the dropped ovary technique (DOT) for spaying cattle which is sometimes referred to as the Willis technique. The Board's concerns include that this is an invasive surgical procedure in the abdomen, which is performed by feel, that the animal experiences pain at the time of the procedure and during the recovery period, and that there is associated morbidity and mortality in animals which have been spayed. While acknowledging that the administration of analgesics prior to the procedure will reduce (but not eliminate) the initial discomfort, the analgesics will not provide long term pain relief during the recovery period.</p> <p>The Board is of the view that improved husbandry and stock management should render cattle spaying unnecessary. In line with views expressed by the RSPCA and the Australian Veterinary Association, it is hoped that research will provide nonsurgical techniques for contraception in cattle and that this technique will become obsolete.</p> <p>The Board notes that in the Animal Health guidelines titled "Australian Animal Welfare Standards and Guidelines for Cattle", page 22, it is stated that G6.1 Surgical procedures should only be done if there are no alternatives and the procedure results in either:</p> <ul style="list-style-type: none"> • Life-time benefits to cattle welfare, or • Better herd management, or • A reduced work health and safety risk. <p>G6.2 Surgical procedures should be done with pain relief. Operators should seek advice on current pain minimisation strategies.</p>	<p>Thanks for your feedback, your comments have been noted and passed onto the SMEWG. Advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit (see responses below to:</p> <p>(1) Application; (2) Performance Criteria; (3) Performance Evidence; and (4) Other Matters)</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
<p>However, as cattle spaying remains legal in Western Australia, in principle the Board is supportive of a program which provides formal instruction rather than the current situation where people performing the procedure learn “on the job”. In itself the program provides significant potential for improving animal welfare in these animals. The in principle support of the course by the Board does not constitute endorsement of the unit.</p>	
<p>(1) Application In this introductory section, it states: The unit applies to individuals who implement procedures for calving under broad direction, and take responsibility for their own work. (Is the word ‘calving’ a typo?) As cattle spaying is aimed at preventing calving, there appears to be no reason why the person is responsible for calving. Recommendation: Delete reference to calving as it is not relevant. The next sentence states: It is essential that candidates who undertake this unit have at least one year’s prior experience working with cattle. The Board’s view is that if cattle spaying must be performed, then it should be performed by highly experienced stockmen and that one year’s prior experience (which could be a substantial time ago) is not adequate. The Board regards a minimum of two years’ experience and preferably five years’ experience handling cattle immediately prior to undertaking this program to be highly desirable. Recommendation: Amend to read: It is essential that candidates who undertake this unit have worked with cattle for at least the previous two years prior to commencing this course. It is noteworthy that while there is reference to users being advised to check with the relevant State or Territory regulatory authority there is no reference to the Australian Animal Welfare Standards and Guidelines for Cattle. This guideline is particularly relevant as on page 21 it states:</p>	<p>Changed unit application to read: ‘This unit of competency describes the skills and knowledge required to plan, prepare and conduct Dropped Ovary Technique (DOT) procedures and post DOT procedures for controlling fertility in females in extensive beef herds. The unit applies to individuals who conduct DOT procedures for spaying cattle under broad direction, and take responsibility for their own work. It is essential that candidates who undertake this unit have worked with cattle for at least one year prior to commencing this unit. All work must be carried out to comply with workplace procedures, health and safety in the workplace requirements, animal welfare legislative, regulatory and codes of practice requirements, and sustainability and biosecurity practices. In addition to legal responsibilities, all units of competency dealing with animals in the AHC Training Package have the requirements for animals to be handled humanely to minimise stress and discomfort. Regulatory requirements apply in some jurisdictions restricting the conduct of the DOT procedure to registered veterinarians. Users are advised to check with the relevant State or Territory regulatory authority.’ Make AHCLSK4XX Pregnancy test livestock an AQF3 level unit and a prerequisite for AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle (note this will require a recoding of AHCLSK335 – not equivalent).</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
<p>S6.7 A person spaying a cow must be a veterinarian or, if permitted in the jurisdiction, be accredited or be under the direct supervision of a veterinarian or a person who is accredited. Recommendation: Include information about the Australian Animal Welfare Standards and Guidelines for Cattle. Furthermore, it is incumbent on providers to ensure these standards are adhered to for the compiling of the program and that when the program becomes available providers must ensure it is delivered in a manner consistent with the Animal Health guidelines. It is noted that there are nil prerequisite units. The Board is strongly of the view that a person who is not competent at performing rectal palpation in cows will not be able to locate ovaries and perform the DOT. A person who cannot reliably locate ovaries is more likely to cause injury to the cow and compromise their welfare. Recommendation: That unit AHCLSK4XX Pregnancy test animals must be prerequisite for the DOT unit.</p>	
<p>(2) Performance Criteria (i) 1. Conduct pre-DOT evaluations: As above, there is no reference to the Australian Animal Welfare Standards and Guidelines for Cattle. It is the Board's view that it is essential that these guidelines are incorporated in this unit. Recommendation: that the Australian Animal Welfare Standards and Guidelines for Cattle are included in this section. (ii) 2. Prepare for DOT operations: For animal welfare reasons it is essential that the cows which are being spayed should be provided analgesia. This is referenced in 4. Conduct DOT procedures provide pain management according to legislative requirements. However, there is strong evidence that analgesia administered prior to an insult or injury (e.g., surgery) is much more effective than administering analgesics after trauma. As there is a delay between when an analgesic is administered and when the analgesic is effective, which is</p>	<p>PC 1.1 refers to 'animal welfare requirements', i.e., 'Identify and comply with relevant State or Territory legislation, regulations, codes of practice and animal welfare requirements' Added PC 2.6 'Administer NSAIDS prior to cow being spayed as specified by veterinary surgeon and according to relevant legislation', and renumbered PC's that follow.</p>

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<p>dependent on drug that is utilised and the route of administration, it is not possible to give a specific time that the drug should be administered prior to the surgery.</p> <p>Under current Western Australian legislation, schedule four (S4) poisons, which include injectable and oral nonsteroidal analgesic drugs (NSAIDs) suitable for use in cattle, can only be supplied by a veterinary surgeon to a client or their agent in compliance with the Regulations. NSAIDs cannot be provided to a third party such as a contractor and at the present time analgesics cannot be dispensed for use by authorised persons.</p> <p>Recommendation: To minimise intraoperative and postoperative pain subsection (ii) "Prepare for dot operations" should be amended to include a requirement for NSAIDs to be administered prior to the cow being spayed at a time interval specified by a veterinary surgeon and in compliance with relevant legislation.</p>	
<p>(3) Performance Evidence The prescribed requirement is that the individual has conducted dropped ovary technique (DOT) procedures for spaying cattle on at least two occasions</p> <p>It is unclear whether the individual has to perform multiple DOT procedures on two separate occasions, or whether this means only perform two DOT procedures. This is an invasive procedure in which the operator by feel must locate the ovaries and without being able to visualise the ovaries amputate them using an implement which has been introduced through the dorsal vagina. There is significant potential for inexperienced operators to fail to locate the ovaries, or to fail to amputate the ovaries, and/or injure other internal organs. Any suggestion that a person could become competent after performing these procedures on two occasions, or worse still only perform DOT procedures on two animals, is nonsensical. Furthermore, there is no reference to these</p>	<p>PE second paragraph changed to read 'There must be evidence that the individual has successfully conducted dropped ovary technique (DOT) procedures for spaying cattle on at least ten animals, and has:'</p> <p>Assessor requirements: is not a mandated national requirement. As such it cannot be mandated in a national competency standard. This may be a requirement in some jurisdictions, please note the following statement has been included in the unit application 'Regulatory requirements apply in some jurisdictions. Users are advised to check with the relevant State or Territory regulatory authority.'</p>

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	<p>procedures being performed under the direct supervision of an appropriately qualified person. It is the view of the Board, that for instruction purposes the only appropriately qualified person is a veterinary surgeon with extensive experience in this area of cattle medicine. The Board is of the view that to achieve a level of competence the individual needs to perform numerous DOT's on a number of occasions under supervision and then undertake a formal assessment.</p> <p>Recommendations:</p> <p>(i) That persons undertaking this unit must be instructed by suitably experienced veterinary surgeons</p> <p>(ii) That the individual must have performed DOT procedures on a total of 50 cows, with the procedures having been performed under supervision on at least 3 separate occasions (e.g., 10 animals on 5 occasions).</p> <p>(iii) For the assessment purposes the individuals must perform a minimum of 20 DOT procedures to professional veterinary standards as assessed by a suitably experienced veterinary surgeon.</p>	
	<p>(4) Other Matters</p> <p>As with pregnancy testing, to remain competent in this technique it is essential that the operator performs multiple spays on a regular basis. To ensure the operator is competent their theoretical and practical skills should be reassessed on a regular basis, and if the individual fails those assessments, they should be required to repeat the unit.</p> <p>Recommendation: To maintain competency, individuals who have completed AHCLSK335 Conduct dropped ovary technique producers for spaying cattle must be reassessed every three years and in the event they fail the assessment they must repeat the unit.</p>	<p>Currency is not normally reflected in national competency standards, and is not a mandated national requirement. This is normally a matter for industry regulators, please note the following statement has been included in the unit application 'Regulatory requirements apply in some jurisdictions. Users are advised to check with the relevant State or Territory regulatory authority.'</p>
<ul style="list-style-type: none"> Industry Association, WA 	<p>Re Application: I like the intent of this statement, but it is a little vague. Perhaps it could be tied to an expectation of particular competences with cattle</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit:</p> <p>Changed unit application second paragraph to read:</p>

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	handling? e.g., AHCLSK202, AHCLSK205, AHCLSK210	<p>The unit applies to individuals who conduct DOT procedures for spaying cattle under broad direction, and take responsibility for their own work. It is essential that candidates who undertake this unit have worked with cattle for at least one year prior to commencing this unit.</p> <p>Make AHCLSK4XX Pregnancy test livestock an AQF3 level unit and a prerequisite for AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle (note this will require a recoding of AHCLSK335 – not equivalent).</p>
• RTO, VIC	Agree re Application: 'It is essential that...working with cattle' Is this an entry requirement? Carried over from current unit?	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit application second paragraph to read:</p> <p>The unit applies to individuals who conduct DOT procedures for spaying cattle under broad direction, and take responsibility for their own work. It is essential that candidates who undertake this unit have worked with cattle for at least one year prior to commencing this unit.</p> <p>Make AHCLSK4XX Pregnancy test livestock an AQF3 level unit and a prerequisite for AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle (note this will require a recoding of AHCLSK335 – not equivalent).</p>
• Industry Association, QLD	Re Application: Accreditation Scheme requirements may apply to non-vet spayers in some states. It is likely this unit will be undertaken as a standalone unit as part of an accreditation scheme. Participants may not have achieved units in cattle handling and husbandry but need to have cattle handling experience to commence training in the unit.	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit application second and last paragraphs to read:</p> <p>The unit applies to individuals who conduct DOT procedures for spaying cattle under broad direction, and take responsibility for their own work. It is essential that candidates who undertake this unit have worked with cattle for at least one year prior to commencing this unit.</p> <p>Regulatory requirements apply in some jurisdictions restricting the conduct of the DOT procedure to registered veterinarians. Users are advised to check with the relevant State or Territory regulatory authority.'</p> <p>Make AHCLSK4XX Pregnancy test livestock an AQF3 level unit and a prerequisite for AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle (note this will require a recoding of AHCLSK335 – not equivalent).</p>

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<ul style="list-style-type: none"> Industry Association, QLD 	<p>Re PC5.2 Spayers may not be present after spaying operations conclude. Must ensure cattle owner/manager is aware of any requirements for observation, care and also reporting outcomes for accreditation schemes if necessary.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, PC 5.1 and 5.2 read as follows: 5.1 Record cattle identity and date of the procedure, with details of significant observations where required 5.2 Inspect cattle regularly with minimal disturbance for signs of post-operative complications during the healing process and take appropriate action where required.</p>
<ul style="list-style-type: none"> Industry Association, WA 	<p>Re Performance Evidence: Insert 'successfully' in lead in sentence Re 2 occasions: Is that 1 cow on each occasion or 1 herds of cows / cattle? Suggest it should be specific about minimum number of cows (perhaps 5) on each occasion.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: PE second sentence changed from 'There must be evidence that the individual has conducted dropped ovary technique (DOT) procedures for spaying cattle on at least two occasions and has:' to 'There must be evidence that the individual has successfully conducted dropped ovary technique (DOT) procedures for spaying cattle on at least ten animals, and has:'.</p>
<ul style="list-style-type: none"> Industry Association, QLD 	<p>Re Performance Evidence: Need to specify or recommend how many animals spayed in the formative assessment/training phase as well as for final assessment. E.G. Summative assessment requires 5 to 10 animals- number of occasions not critical if training has already included multiple animals and occasions.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: PE second sentence changed from 'There must be evidence that the individual has conducted dropped ovary technique (DOT) procedures for spaying cattle on at least two occasions and has:' to 'There must be evidence that the individual has successfully conducted dropped ovary technique (DOT) procedures for spaying cattle on at least ten animals, and has:'.</p>
AHCLSK3XX Pregnancy test livestock (formerly AHCLSK408 Pregnancy test animals)		
<ul style="list-style-type: none"> Industry Association, WA 	<p>AHCLSK4XX Pregnancy test animals The Board in principle supports a course which provides instruction for pregnancy testing in cattle, subject to the following observations and recommendations on the draft program being adopted. As this is a draft document and the content of the program has not been finalised the Board cannot guarantee graduates from the program will meet the competency criteria for authorisation in WA as a pregnancy tester. The in principle support of this course does not constitute endorsement of the program by the Board. (1) Course title The title “pregnancy test animals” is a general term which does not specify which species of animals will be covered in the course. In Western Australia, any invasive procedure such as the rectal</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit to AQF 3, changed unit code and title to 'AHCLSK3XX Pregnancy test livestock', and reflected livestock throughout unit content. Note: Ultrasound is not performed via the rectum for all livestock (i.e. sheep).</p>

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<p>examination of an animal to determine pregnancy status is an act of veterinary surgery.</p> <p>(i) In the case of cattle, under the Veterinary Surgeons Regulations 1979 (the Regulations) suitably experienced lay persons (i.e., persons who are not registered veterinary surgeons) with appropriate competency can apply to the Board for authorisation to perform pregnancy testing by rectal palpation and/or rectal probe (ultrasound examination).</p> <p>(ii) In the case of horses, only registered veterinary surgeons are permitted to perform rectal examinations due to the much greater risk of injury to the animal and to the operator. Of particular concern is the risk of rectal tears which may lead to death of the horse from septic peritonitis. Accordingly lay persons are not eligible to apply for authorisation to perform pregnancy testing in mares.</p> <p>Recommendation: As this course is intended for the livestock industry the Board strongly recommends that the title is amended to reflect its purpose and that the unit is titled "Pregnancy test cattle". It is noted that subsequent amendment will be required throughout the document to clarify that instruction will only be provided for cattle. It should be specified that this course applies to pregnancy testing via the rectum (whether manually or by rectal probe)</p>	
<p>(2) Application</p> <p>(i) Diagnosis: The introductory paragraph refers to ...pregnancy testing and diagnosis, and post testing procedures in livestock animals. Under section 2 of The Act, veterinary surgery is defined to include (a) the examination of any animal for the purpose of the diagnosis of disease in, or injury to, that animal, or the conduct of tests, whether physiological or pathological, on any animal for diagnostic purposes:</p> <p>The Board is of the view that authorised persons can perform pregnancy testing in which an animal is determined to be pregnant or not pregnant, but</p>	<p>Changed unit application to read:</p> <p>'This unit of competency describes the skills and knowledge required to prepare for pregnancy testing, arrange pregnancy testing support, carry out pregnancy testing, and post testing procedures in livestock.</p> <p>The unit applies to individuals who apply specialist skills and knowledge to pregnancy test livestock by rectal palpation or ultrasound. This includes applying and communicating non-routine technical solutions to predictable and unpredictable problems.</p> <p>This unit is not to be used for pregnancy testing of horses.</p>

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<p>pregnancy diagnosis and the diagnosis of reproductive disease are acts of veterinary surgery which can only be performed by veterinary surgeons.</p> <p>Recommendation: Amend the last sentence in the introductory paragraph to read ...pregnancy testing and diagnosis, and post testing procedures in livestock animals. References to pregnancy diagnosis in the remainder of the document should be amended to pregnancy testing.</p> <p>(ii) Terminology: The second paragraph refers to ...manually pregnancy test animals. However, in clause 3.5, the performance criteria described as Carry out ultrasound or rectal examination and palpation</p> <p>The Board is of the view that the use of the phrase manually pregnancy test animals in the introductory paragraphs is misleading as this only refers to rectal palpation when there is clear intent later in the document to provide instruction on both ultrasound and rectal palpation pregnancy testing. The Board is not opposed to instruction being provided for either form of pregnancy testing, but wishes to ensure there is no confusion regarding the procedures which are being taught in the module. As discussed previously, these techniques should only be applicable to cattle</p> <p>Recommendation: Amend manually pregnancy test animals to pregnancy test cattle by rectal palpation and rectal probe (ultrasound).</p> <p>(iii) Legal requirements: The final paragraph states No licensing, legislative or certification requirements apply to this unit at the time of publication. As noted above, only persons authorised by the Board can perform pregnancy testing in cattle in Western Australia. This includes persons learning how to perform pregnancy testing and the persons providing instruction and assessing competency in pregnancy testing.</p> <p>Recommendation: Correct the legal requirements statement to reflect that in Western Australia only persons who are authorised by the Veterinary</p>	<p>All work must be carried out to comply with workplace procedures, health and safety in the workplace requirements, animal welfare legislative, regulatory and codes of practice requirements, and sustainability and biosecurity practices.</p> <p>In addition to legal responsibilities, all units of competency dealing with animals in the AHC Training Package have the requirements for animals to be handled humanely to minimise stress and discomfort.</p> <p>Regulatory requirements apply in some jurisdictions. Users are advised to check with the relevant State or Territory regulatory authority.'</p>

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	Surgeons Board can perform pregnancy testing in cattle.
	<p>(3) Performance Criteria (i) 4. Post pregnancy testing procedures: Subclause 4.2 states: Accurately determine litter size where applicable. This subclause is in the wrong section as the number of foetuses would be determined at the time the pregnancy testing was done (i.e., It should be under part 3: Carry out pregnancy diagnosis testing procedures). As the pregnancy testing is being done in cattle the use of the phrase litter size is inappropriate as cattle typically only have one calf, sometimes twins and very rarely more than two foetuses. In early pregnancy it can be difficult to determine if multiple foetuses are present by rectal palpation. Recommendation: Shift subclause 4.2 to part 3, and amend the phrase determine litter size where applicable to read determine the number of foetuses where possible.</p>
	<p>(4) Assessment requirements (i) Performance Evidence: The requirements state: An individual demonstrating competency must satisfy all the elements and performance criteria in this unit. There must be evidence that the individual has successfully pregnancy tested animals during different stages of gestation using both ultrasound and manual pregnancy diagnosis on at least ten occasions... This second sentence is unclear as it doesn't differentiate between testing a number of animals on separate occasions versus the number of animals which need to be tested on each of those occasions. To achieve competence in cattle pregnancy testing, whether by ultrasound or rectal palpation, the operator needs to examine large numbers of cattle and to maintain competence the operator needs to continue pregnancy testing significant numbers. It should be noted that the Board's guidelines on pregnancy testing in cattle</p>

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<p>specify that authorised persons need to demonstrate their maintenance of competency by having examined for pregnancy a moving average over a three (3) year period of at least 500 cattle per year. (Cattle veterinarians undertaking the PREgCHECK™ accreditation program need to pregnancy test 2000 cattle and then undertake an examination testing 100 cattle with 100% accuracy). In order to ensure persons completing this course will have sufficient experience for the Board to consider an application for authorisation to pregnancy test cattle it is necessary for the course outline to be more specific. The Board is comfortable that the trainee needs to have pregnancy tested cattle on at least 10 occasions, but the number of animals should be specified. Additionally, there is little point in performing ultrasound and rectal palpation pregnancy testing on the same animal as the operator should know whether the animal is pregnant after the first examination. Therefore, the number of animals for each procedure needs to be specified. Recommendation: It is strongly recommended that on each of 10 occasions a minimum of 20 cows are pregnancy tested by rectal probe and another 20 cows are pregnancy tested by rectal palpation.</p>	
<p>(ii) Knowledge Evidence: These include anatomy and physiology of the animal species and reproductive physiology and pregnancy development of the animal species. If the Board's recommendation above under "Course Title" are accepted, aside from changing animal species to cattle no further action is required. However, if that recommendation is not accepted and the course content covers other species, in particular horses, then the Board is concerned. Firstly, it would mean the course content would be greatly increased as equine reproductive physiology is very different to the bovine, the pregnancy testing techniques are different, the facilities to restrain the animals are very different and so are the OHS aspects.</p>	<p>Unit title changed to 'Pregnancy test livestock' and this has been reflected throughout unit content. The following sentence has been added to the unit application 'This unit is not to be used for pregnancy testing of horses.' The PE second paragraph changed to read 'There must be evidence that the individual has successfully pregnancy tested livestock during different stages of gestation using manual pregnancy testing techniques on a minimum of twenty animals with an accuracy of 95%, and has:'.</p>

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<p>Secondly, lay persons performing pregnancy testing in horses in Western Australia is in breach of the Act (whether in a training program or as a commercial operator) and could lead to that person being prosecuted. Thirdly, there is no prospect that those persons would be authorised by the Board to pregnancy test horses.</p> <p>Recommendation: That the pregnancy testing course is restricted to cattle and information is not provided in regard to horses.</p> <p>(iii) Assessment Conditions: There is no specification as to the number of animals which must be pregnancy tested by rectal probe and rectal palpation nor the accuracy of testing. In order for the Board to have confidence in applicants for authorisation to pregnancy test cattle, there must be an assessment undertaken on reasonable numbers of cattle and the pregnancy testing must be accurate. Previously, while expressing concern that the number of animals was minimal, the Board has accepted 100% accuracy on 20 animals as evidence of sufficient competence for the person to be authorised.</p> <p>Recommendation: Assessment of competence for using rectal probe and rectal palpation pregnancy testing should include a requirement for 100% accuracy on 20 animals at various stages of gestation for each of the two procedures.</p>	
<p>(5) Other Matters</p> <p>Pregnancy testing is an invasive procedure with potential for rectal tears that can result in peritonitis and in extreme cases the infections can be fatal. These animal welfare issues are increased when the cows are being examined by novices learning pregnancy techniques and the risk is greatly increased if the same cow is examined by multiple individuals. To minimise this risk, it is essential that veterinary surgeons with extensive experience in cattle pregnancy testing are present to ensure the welfare of the animals and in the event that a cow is injured to provide appropriate treatment.</p>	<p>PREgCHECK™ accreditation is a proprietary product, and is not a mandated requirement in all jurisdictions. As such this cannot be mandated in a national unit of competency. Currency is not normally reflected in national competency standards, and is not a mandated national requirement. This is normally a matter for industry regulators, please note the following statement has been included in the unit application 'Regulatory requirements apply in some jurisdictions. Users are advised to check with the relevant State or Territory regulatory authority.'</p>

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	<p>Recommendation: For animal welfare reasons and to ensure accuracy and understanding of theoretical content that all instruction and assessment for this program should be provided by veterinary surgeons with PREgCHECK™ accreditation. To maintain competency as a pregnancy tester it is essential that the individual pregnancy tests substantial numbers of animals on an ongoing basis. As there is no form of compulsory continuing professional development for lay pregnancy testers the Board believes there is merit in limiting the life of the qualification to ensure the pregnancy tester keeps up to date with their theoretical knowledge and their competence is assessed by an independent assessor.</p> <p>Recommendation: To maintain competency, individuals who have completed AHCLSK4XX Pregnancy test animals must be reassessed every three years and in the event they fail the assessment they must repeat the unit.</p>	
<ul style="list-style-type: none"> Industry Association, National 	No comments on draft unit - seems very good	Thanks for your feedback, your support is noted.
<ul style="list-style-type: none"> RTO, VIC 	<p>Question – Can pregnancy testing can only be undertaken by veterinarians in some states? Animal ethics issues for RTOs as per comments above for AHCAIS303.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit application last paragraph (licensing statement) to read: Regulatory requirements apply in some jurisdictions. Users are advised to check with the relevant State or Territory regulatory authority.'</p>
<ul style="list-style-type: none"> RTO, VIC 	<p>Re PC 3.5 - Specialised area requiring training?? Does medical imaging require license?</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit application last paragraph (licensing statement) to read: Regulatory requirements apply in some jurisdictions. Users are advised to check with the relevant State or Territory regulatory authority.'</p>
<ul style="list-style-type: none"> Industry Association, QLD 	<p>Re PC 3.5 - Need to specify that both ultrasound and manual palpation are required to obtain competency in this unit. Perhaps 2 separate criteria?</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit application second and third paragraph to read: 'The unit applies to individuals who apply specialist skills and knowledge to pregnancy test livestock by rectal palpation or ultrasound. This includes</p>

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		<p>applying and communicating non-routine technical solutions to predictable and unpredictable problems.</p> <p>This unit is not to be used for pregnancy testing of horses.'</p>
<ul style="list-style-type: none"> Industry Association, National 	<p>General comment on unit: Pregnancy testing by rectal exam should be a vet only activity. This is the backbone of many vet practices in rural areas and if no longer viable these practices will close to the detriment of animals in rural locations and biosecurity</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit application second and third paragraph to read:</p> <p>'The unit applies to individuals who apply specialist skills and knowledge to pregnancy test livestock by rectal palpation or ultrasound. This includes applying and communicating non-routine technical solutions to predictable and unpredictable problems.</p> <p>This unit is not to be used for pregnancy testing of horses.'</p>
<ul style="list-style-type: none"> RTO, VIC 	<p>title should reflect application livestock animal only - sector is LSK but may need a clearer title Livestock would cover farm animals i.e., cattle, horse, goats</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit title to 'Pregnancy test livestock', and reflect livestock throughout unit content. In addition, added paragraph to unit application 'This unit is not to be used for pregnancy testing of horses.'</p>
<ul style="list-style-type: none"> Industry Association, WA 	<p>Re Application 1st paragraph against '...livestock animals'. what about horses? I understand they are manually pregnancy tested also, although more likely to be by a VET. Re PC2.3 - I'm not sure that this is a task - more a condition. Either way, it fits under 3. below.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit title to 'Pregnancy test livestock', and reflected livestock throughout unit content. Changed unit application first and third paragraph to read:</p> <p>'This unit of competency describes the skills and knowledge required to prepare for pregnancy testing, arrange pregnancy testing support, carry out pregnancy testing, and post testing procedures in livestock.</p> <p>This unit is not to be used for pregnancy testing of horses.'</p> <p>PC 2.3 changed to 'Handle and test livestock according to animal welfare practices'.</p>
<ul style="list-style-type: none"> Industry Association, QLD 	<p>Re Application against 2nd paragraph - Not sure what this actually means? Re last paragraph re licensing, legislation, etc Accreditation schemes based on this unit are in development. Qld based scheme will require competency in both manual palpation and ultrasound for accreditation so the changes in this unit are important and relevant.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed unit application second, third and last paragraph to read:</p> <p>'The unit applies to individuals who apply specialist skills and knowledge to pregnancy test livestock by rectal palpation or ultrasound. This includes applying and communicating non-routine technical solutions to predictable and unpredictable problems.</p>

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		<p>This unit is not to be used for pregnancy testing of horses.</p> <p>Regulatory requirements apply in some jurisdictions. Users are advised to check with the relevant State or Territory regulatory authority.'</p>
<ul style="list-style-type: none"> Industry Association, WA 	<p>PC 4.2 re 'litter size' - I don't think livestock animals have litters</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Removed PC 4.2, and renumbered PC's that follow.</p>
<ul style="list-style-type: none"> Industry Association, QLD 	<p>Re PC 4.3 Consign... - This is not the role or task of a preg tester. Performance Evidence re ten occasions - Need to specify more than 10 and of each method. For summative assessment- at least 30 of each method. Accreditation schemes may have to set an additional assessment if this is too low. Re 'carried out ultrasound...practices' - Carried out both manual palpation and ultrasound diagnosis</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Removed PC 4.2, and renumbered PC's that follow. PC 4.3 to remain PE second paragraph changed to 'There must be evidence that the individual has successfully pregnancy tested livestock during different stages of gestation using manual pregnancy testing techniques on a minimum of twenty animals with an accuracy of 95%, and has:'</p>
<ul style="list-style-type: none"> RTO, VIC 	<p>Re Knowledge Evidence 'ultrasound and manual...methods' - would be good if knowledge for milk and blood testing was included</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following advice being provided: Milk and blood testing not to be included in this unit as not applicable to all livestock.</p>
<ul style="list-style-type: none"> Industry Association, National 	<p>Re Knowledge Evidence 'ultrasound and manual...methods' - milk and blood testing should replace rectal pregnancy testing</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following advice being provided: Milk and blood testing not to be included in this unit as not applicable to all livestock.</p>
<ul style="list-style-type: none"> Industry Association, QLD 	<p>Re Knowledge Evidence 'ultrasound and manual...methods' - Milk and blood testing should remain outside the scope of this unit.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following advice being provided: Milk and blood testing not to be included in this unit as not applicable to all livestock.</p>
<ul style="list-style-type: none"> RTO, VIC 	<p>Re Knowledge Evidence 'ultrasound and manual...methods' - Agree with XXX and XXX Common methods - Manual (rectal) examination/palpation and/or an ultrasound probe. Laboratory testing of a sample of milk or blood obtained from the cow to determine the level of specific proteins or hormones associated with pregnancy. Addition of ultrasound KE seems incomplete need more detail relating to use of machine, reading, calibration??</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following advice being provided: Milk and blood testing not to be included in this unit as not applicable to all livestock. Changes made to KE to include livestock, and pregnancy testing.</p>

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
<ul style="list-style-type: none"> Industry Association NT 	<p>The accessibility to the 'AHCLSK4XX Pregnancy test animals' unit is important for the Northern Territory due to the shortage to access veterinarians.</p> <ul style="list-style-type: none"> Unsure why AHCLSK4XX Pregnancy test animals' is skill level is at a level 4. The practice of 'AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle' is recognised as a skill level 3 when the techniques are not as a higher risk and less invasive to the 'pregnancy test animals' unit. Farmers have excellent knowledge about animal anatomy and should be recognised to be at the skill level to be able to perform pregnancy testing on their animals and have access to the 'AHCLSK4XX Pregnancy test animals' unit. There is a shortage of veterinarians in the Northern Territory, this is why there is a need for non-veterinarians to gain permission to undertake pregnancy testing. Current certification in the NT to undertake pregnancy testing on animals requires competency to be demonstrated on 1500 animals over three years and no complaints reported against the certifying officer. The practical examination was in diagnosing 20 animals as pregnant or non-pregnant (100% accuracy). no reason was provided to not support the requirements within 'AHCLSK4XX Pregnancy test animals' to, 'successfully pregnancy tested animals during different stages of gestation using both ultrasound and manual pregnancy diagnosis on at least ten occasions.' Ultrasound technics are not used in very remote regions of the Northern Territory, there is no reason why someone could not gain these skills, the only issue of concern is how does someone then maintains the currency of skills. One RTO stakeholder does not support the requirement to do both ultrasound and scan, the second RTO stakeholder was not opposed to the requirements. Supported obtained for the testing at different stages. Recommendation: The learner

Thanks for your feedback, your comments have been passed onto the SME WG. Advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit:
 Changed unit title to 'Pregnancy test livestock', and reflect livestock throughout unit content.
 Note: Ultrasound is not performed via the rectum for all livestock (i.e., sheep).

Changed unit application to read:
 'This unit of competency describes the skills and knowledge required to prepare for pregnancy testing, arrange pregnancy testing support, carry out pregnancy testing, and post testing procedures in livestock.
 The unit applies to individuals who apply specialist skills and knowledge to pregnancy test livestock by rectal palpation or ultrasound. This includes applying and communicating non-routine technical solutions to predictable and unpredictable problems.
 This unit is not to be used for pregnancy testing of horses.
 All work must be carried out to comply with workplace procedures, health and safety in the workplace requirements, animal welfare legislative, regulatory and codes of practice requirements, and sustainability and biosecurity practices.
 In addition to legal responsibilities, all units of competency dealing with animals in the AHC Training Package have the requirements for animals to be handled humanely to minimise stress and discomfort.
 Regulatory requirements apply in some jurisdictions. Users are advised to check with the relevant State or Territory regulatory authority.'

PE second paragraph changed to 'There must be evidence that the individual has successfully pregnancy tested livestock during different stages of gestation using manual pregnancy testing techniques on a minimum of twenty animals with an accuracy of 95%, and has:'
 Note: Manual pregnancy testing - rectal palpation or ultrasound.
 Note: Made AHCLSK4XX Pregnancy test livestock an AQF3 level unit.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>should be doing more than 10. That is considered quite minimalistic, especially if these people are going to be deemed competent, the learner needs to be able to be performing pregnancy testing on a fair few more, recommendation for 20 as a minimum</p>	
	<p>The practice of learning to pregnancy test animals must be performed under supervision. Recommendation: the task of pregnancy testing to be performed under supervision with 100% accuracy.</p> <ul style="list-style-type: none"> • Pregnancy testing of animal practices will need to remain available to be conducted by a certified non-veterinarian due to the lack of accessibility to veterinarians in the Northern Territory. • The veterinary board member of the NT has no reason to oppose the proposed training standards for 'AHCLSK4XX Pregnancy test animals' but are concerned about how ultrasound techniques competency will be maintained. • NT Buffalo Industry Council is strongly supporting accessibility of the 'AHCLSK4XX Pregnancy test animals', the skills are needed to remain accessible for pregnancy testers through the industry to maintain registration to conduct these services across the Northern Territory. There is not enough vets in the NT to carry out this work. 	<p>Thanks for your feedback, your comments have been passed onto the SME WG. The assessment conditions section of the unit of competency has the following statement regarding assessors: 'Assessors of this unit must satisfy the requirements for assessors in applicable vocational education and training legislation, frameworks and/or standards.'. The NVR requires assessors to be current in the units of competency they are assessing.</p> <p>Note: Made AHCLSK4XX Pregnancy test livestock an AQF3 level unit.</p>
AHCLSK411 Supervise natural mating of livestock		
<ul style="list-style-type: none"> • Industry Association, National 	<p>Performance Evidence: delete part of PE point - refer red text: 'monitored joining activity and return to oestrus' as not applicable to deer farming Knowledge Evidence: deleted 'ovulation stimulation and synchronisation' changed wording 'workplace breeding programs and selection criteria, including Estimated Breeding Values (EBV) and Australian Sheep Breeding Values (ASBV)' Comment = No one really does this with deer in Australia, but it is becoming widely used in the NZ deer industry.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this units PE and KE, with the following advice being provided: Change 'monitored joining activity and return to oestrus' to 'monitored joining activity and animal cycles' Change 'ovulation stimulation and synchronisation' to 'ovulation stimulation and synchronisation relevant to animal type' Change 'workplace breeding programs and selection criteria, including Estimated Breeding Values (EBV) and Australian Sheep Breeding Values (ASBV)' to 'workplace breeding programs and selection criteria, including relevant breeding values'</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
• RTO, VIC	PE specifies poultry eggs? Sheep specified in Knowledge Evidence. Suggest check for applications for a range of livestock.	Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this units PE, with the following advice being provided: Change 'collected and checked poultry eggs for fertility where applicable' to 'checked animal fertility'
• RTO, VIC	Re Knowledge Evidence: 'workplace breeding....EBV and ASBV) - Insert 'And Actual Breeding Values'	Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this units KE, with the following advice being provided: Change 'workplace breeding programs and selection criteria, including Estimated Breeding Values (EBV) and Australian Sheep Breeding Values (ASBV)' to 'workplace breeding programs and selection criteria, including relevant breeding values'
AHCLSK416 Identify and select animals for breeding		
• Industry Association, National	Knowledge Evidence: delete part: 'strategies for animal selection..., Estimated Breeding Value (EBV), Australian Sheep Breeding Values (ASBV) , and indexes' as not applicable to deer farming	Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this units KE, with the following advice being provided: Change 'strategies for animal selection, including individual traits, measured performance, Estimated Breeding Value (EBV), Australian Sheep Breeding Values (ASBV), and indexes' to 'strategies for animal selection, including individual traits, measured performance, relevant breeding values, and indexes'
• RTO, VIC	Sheep specified in Knowledge Evidence - Is KE inclusive of all livestock?	
AHCLSK503 Develop and implement a breeding strategy		
• Industry Association, National	No comments on draft unit - seems very good	Thanks for your feedback, your support is noted.
AHCLSK505 Develop production plans for livestock		
• Industry Association, National	No comments on draft unit - seems very good	Thanks for your feedback, your support is noted.
AHCLSK507 Plan, monitor and evaluate strategies to improve livestock through genetics		
• Industry Association, National	Comment under PC1.4: I also suggest adding the need to keep an open mind on the continually changing market requirements. I have found this very important this year with the velvet - in the past animals have been bred using the biggest and most multi-pointed antler genetics available to satisfy both velvet and trophy markets in NZ. All our genetics for deer come from NZ. Now we are finding these style heads are not suitable for velvet production as they	Thanks for your feedback, your comments have been passed onto the SMEWG.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	are lower quality and hard to process. Prices for grades of velvet from trophy genetics are dropping, the market does not want it. As it can take several years for the unwanted traits to be visible, it is important to keep a check on this.	
• RTO, VIC	Re Performance Evidence: 'used estimated breeding values' - Comment is 'or actual breeding values as used in some industries'	Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this units PE, with the following advice being provided: Change 'used estimated breeding values' to 'used relevant breeding values'
AHCPLY301 Artificially inseminate poultry – Unit to be deleted		
• Industry Association, WA	Re PC 2.2 and in accordance with animal health and welfare requirements. Re Performance Evidence 'There must be.....inseminated poultry on at least two separate...' – This could be interpreted as just 2 birds - one on each of 2 occasions. Add the words 'a flock of..'	Thanks for your feedback, advice from the SMEWG was sought regarding this unit, with the following changes being made to this unit: Changed PC 2.2 to 'catch and handle birds appropriately according to animal welfare procedures' Changed PE second sentence to 'There must be evidence that the individual has artificially inseminated poultry of the same species type on at least twenty separate occasions, and has:'.
AHCPRK301 Pregnancy test pigs		
• RTO, VIC	Similar unit to AHCLSK4XX Pregnancy test livestock. Any similar issues as per the feedback for AHCAIS303?	Thanks for your feedback, no issues received regarding this unit, however, advice from the SMEWG was sought regarding the feedback you provided, with the following advice being provided: No issues with this unit, works well for us.
AHCPRK303 Artificially inseminate pigs		
• RTO, VIC	Similar unit to AHCAIS303 Artificially inseminate livestock. Are there accreditation requirements as in AIS303?	Thanks for your feedback, advice from the SMEWG was sought regarding the feedback you provided on the unit being similar to AHCAIS303 and whether there are accreditation requirements for this unit. With the following advice being provided: There are no accreditation requirements for this unit, this unit is similar but not the same as AHCAIS303. Some examples: pigs use fresh semen; we do not muster/yard or draft; we do not restrain; and we do not any veterinary treatments. Those who complete livestock AI (i.e., cattle) could not do AI pigs, completely different process.
• RTO, VIC	1. AHCPRK303 Artificially inseminate pigs; The unit now includes – “There must be evidence that the individual has successfully artificially inseminated at least ten pigs with an accuracy of over 85 percent.....”	Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this units PE, with the following advice being provided: 85% takes into account seasonal infertility and faulty semen supply. PE to remain at 85 percent.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>While 85% accuracy definitely reflects current industry parameters, this does not take into account some key factors.</p> <p>a. Seasonal infertility – this is something that the student may not have direct control of and could influence their ability to achieve 85%.</p> <p>b. Faulty semen supply – many farms purchase in semen from outside suppliers. While all measures are taken to ensure the efficacy of semen, one bad batch could greatly diminish an individuals' AI success.</p> <p>c. Tracing/record keeping – to what point of pregnancy are we measuring success? Is it up to the first pregnancy test? On intensive farms this is typically conducted at 5 or 6 wks however, on many outbred farms, preg testing is conducted irregularly and farrowing rate is determined as an average over the herd meaning it can regularly fall below 85%.</p>	
AHCPRK3XX Mate pigs naturally AHCPRK3XX Monitor dry sow performance (formerly AHCPRK304 Mate pigs and monitor dry sow performance)		
<ul style="list-style-type: none"> RTO, VIC 	<p>I have attached a copy of the draft unit with my notes for feedback. Even prior to these proposed changes, I was of the opinion that this is really two separate units; 1. Mate pigs naturally and 2. Monitor dry sow performance. Splitting these tasks would then allow students who only use AI on farm to participate in training/learning specific to the care of pregnant sows.</p> <p>Marked up draft indicates the following belong in Monitor dry sow unit: E1 and PC1.1-1.4, PC 3.1, E4 and PC4.1-4.2 PEs 'determine condition of gilts,.....nutrition for mating', 'determined and provided....for pregnant sows', KEs Split 'husbandry and management practices for non-pregnant sows', reproductive physiology...of sows', Split 'animal welfare legislation.. relevant to monitoring dry sow performance'</p> <p>Marked up draft indicates the following belong in Mate pigs naturally unit:</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding feedback splitting this unit into two separate units, 'Mate pigs naturally' and 'Monitor dry sow performance'. With the following advice being provided: Split unit into two AQF 3 level units as recommended.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>E2 and PCs2.1-2.7 - also comment "This does not take into account 'Dynamic' mating that is typically used in outdoor herds", PC 3.2</p> <p>PEs 'facilitated mating', completed mating procedure</p> <p>KEs 'nutritional requirements for boars', Split 'husbandry and...for pregnant sows', 'anatomy and physiology...and boars', 'requirements, methods...rates in pigs', Split 'animal welfare...relevant to mating of pigs'</p> <p>Marked up draft indicates the following should be included in both units if split:</p> <p>PEs 'followed relevant workplace...procedures', followed workplace...welfare practices'</p> <p>KEs 'methods and procedures...in sows', methods and management...in pigs', documentation...requirements'</p>	

General comments revised units of competency

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
General Feedback		
<ul style="list-style-type: none"> RTO, NSW 	<p>While writing a Student Workbook for our organisation I have noted that many of the livestock units such as the Animal Welfare unit AHCLSK331 and a number of other units refer to the Code of Practice of Animal Welfare. With the new work that is being done in regard to Animal Welfare practices they are no longer called Codes of Practice but Standards and Guidelines and some of the content has changed. It would be suggested that these livestock units be reviewed as soon as possible.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding the feedback you provided, with the following advice being provided: They are called Codes of Practice i.e., the Code of Practice for Domestic Poultry. These codes consist of Standards and Guidelines. Previously they were written as guidelines. No changes required for units.</p>
<ul style="list-style-type: none"> Industry Association, WA 	<p>Re: Animal Reproduction Project</p> <p>The Veterinary Surgeons Board (the Board) thanks you for the invitation to comment on the content of these qualifications and appreciates being given sufficient time to assess them.</p> <p>The Board, established and operating under the provisions of the Veterinary Surgeons Act 1960 (the Act), regulates in the public interest the practice of veterinary surgery in Western Australia. Of the proposed courses in the Animal Reproduction Project there are two units, being</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding these two units, please see responses provided at AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle, and AHCLSK4XX Pregnancy test livestock.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	AHCLSK4XX Pregnancy test animals and AHCLSK335 Conduct dropped ovary technique producers for spaying cattle, which are of particular interest to the Board and the comments below are restricted to those courses.	
<ul style="list-style-type: none"> Industry Association, National 	<p>Please find attached amended units relevant to deer (data entered in Units tab). Most seem very good, just a few items were not applicable. Deer only have a small breeding season once a year. In Australia that is approximately from early March to Mid-late May. Fawns are born in Late spring, early summer.</p> <p>In relation to AI - deer are not done like cattle. An AI program is created with programming dates. A goat CIDR (Controlled Internal Drug Release) is inserted on Day 0, a few weeks later the CIDRS are removed, hinds are given an injection of PMSG and so many hours later the AI takes place. There is no need to check for oestrus, but it can be visible at CIDR removal.</p>	Thanks for your feedback, advice from the SMEWG was sought regarding the feedback you provided, please see responses provided to your feedback regarding the units of competency.
<ul style="list-style-type: none"> RTO, VIC 	<p>I have attached some feedback for the Animal Reproduction Project (qualification and units) that is additional to feedback registered last week on the project website.</p> <p>There is obvious crossover (similar unit outcomes) between the artificial insemination units AHCAIS303 Artificially inseminate livestock and AHCPRK303 Artificially inseminate pigs. Does there need to be a specialised unit for pigs. Same comment for the pregnancy testing units AHCLSK4XX Pregnancy test animals and AHCPRK301 Pregnancy test pigs.</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding the feedback you provided on whether there needs to be separate AI and PT units for pigs (i.e., AHCAIS303 versus AHCPRK303 and AHCLSK4XX Pregnancy test livestock versus AHCPRK301)., with the following advice being provided:</p> <p>Yes they need to be separate, the units are similar but not the same. Some examples: pigs use fresh semen and pregnancy testing is very common and the use of electronic pregnancy testing equipment; we do not muster/yard or draft; we do not restrain; or do any veterinary treatments; and we do not determine number of foetuses.</p> <p>Those who complete livestock AI (i.e., cattle) could not do AI pigs, completely different process.</p>
<ul style="list-style-type: none"> RTO, VIC 	<p>I have reviewed the draft changes to the AHCPRK units.</p> <p>In particular I would like to comment on;</p> <p>1. AHCPRK303 Artificially inseminate pigs; The unit now includes – “There must be evidence that the individual has successfully artificially inseminated at least ten pigs with an accuracy of over 85 percent.....”</p>	Thanks for your feedback, advice from the SMEWG was sought regarding feedback on this units PE, with the following advice being provided: 85% takes into account seasonal infertility and faulty semen supply. PE to remain at 85 percent.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>While 85% accuracy definitely reflects current industry parameters, this does not take into account some key factors.</p> <p>a. Seasonal infertility – this is something that the student may not have direct control of and could influence their ability to achieve 85%.</p> <p>b. Faulty semen supply – many farms purchase in semen from outside suppliers. While all measures are taken to ensure the efficacy of semen, one bad batch could greatly diminish an individuals' AI success.</p> <p>c. Tracing/record keeping – to what point of pregnancy are we measuring success? Is it up to the first pregnancy test? On intensive farms this is typically conducted at 5 or 6 weeks however, on many outbred farms, preg testing is conducted irregularly and farrowing rate is determined as an average over the herd meaning it can regularly fall below 85%.</p>	
<ul style="list-style-type: none"> Industry Association, QLD 	<p>I have added comments on the website feedback pages for these units. The feedback is from our Cattle Board including the Chair. It was discussed at several meetings and in an email conversation amongst board members.</p> <p>AHCLSK4XX Pregnancy test animals AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle</p> <p>Q1. A key question we have is why AHCLSK335 is a level 3 unit and Preg Testing is Level 4 when the skills required for spaying are more difficult to obtain and actually include the palpation skills for preg testing?</p> <p>Q2. The other comments are around how many animals should be spayed or preg tested for a true test of competency. We feel that learners should be assessed formatively for quite a number as part of the training program and then the final summative assessment should be focussed on technique and application of knowledge, so less animals required</p>	<p>Thanks for your feedback, advice from the SMEWG was sought regarding whether AHCLSK4XX Pregnancy test livestock should be a AQF 3 level unit, and whether AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle should have AHCLSK4XX Pregnancy test livestock as a prerequisite unit. With the following advice being provided: Make AHCLSK4XX Pregnancy test livestock an AQF3 level unit and a prerequisite for AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle (note this will require a recoding of AHCLSK335 – not equivalent).</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>but enough to assure the applicant can spay or test under pressure. This is also relevant to the RPL process and there will be very significant RPL numbers initially when the accreditation schemes for these two skills launch during 2021. Qld Government has already approved “lay” preg testing so the debate with vets is over. For spaying the vets have been working with us and are happy with the training and assessment we developed for the current unit as well as the accreditation scheme for lay spayers.</p> <p>We may need another conversation with you about the numbers of animals to be tested or spayed.</p>	
<ul style="list-style-type: none"> Government Department, WA 	<p>Thank you for the opportunity to provide feedback on the draft AHC Agriculture, Horticulture and Conservation and Land Management Training Package - Animal Reproduction project</p> <p>On review of the draft material, we would like to provide feedback on the following:</p> <p>Qualification</p> <p>Regarding two AHC Agriculture, Horticulture and Conservation and Land Management Training Package projects:</p> <ul style="list-style-type: none"> Animal Reproduction Dairy and Milk Harvesting <p>Could you please confirm if projects are both reviewing the qualification - AHC30216 Certificate III in Agriculture (Dairy Production) concurrently. I have attached the draft qualification outlines from both projects. If both projects are reviewing the qualification, can you please advise if the changes/amendments will be released simultaneously.</p> <p>Unit</p> <p>We have noticed the Performance Evidence for the unit - AHCAIS303 Artificially inseminate livestock States on at least ten occasions. Just to confirm this is number correct.</p> <p>Skill Set</p> <p>AHCSS00057 Poultry Industry Beak Tipping Skill Set</p>	<p>Regarding the AHC30216 Certificate III in Agriculture (Dairy Production):</p> <p>You are correct – both projects are reviewing the qualification concurrently and both projects will be linked to the same draft document on the feedback hub, so stakeholders visiting the draft document from each project page will be able to review the same final draft and view comments from others. The reviews are largely being driven by the units relevant to each project. For example, this project relates to units of competency that directly relate to Animal Reproduction. However, any changes to these units will have an impact on the qualification eg if an Animal Reproduction unit is deleted or added to the Core, this will impact the qualification.</p> <p>Regarding <i>AHCAIS303 Artificially inseminate livestock</i> and Performance Evidence stating ‘at least 10 occasions’:</p> <p>This number is correct as of the current date. Public consultation feedback will ascertain if industry is satisfied with this volume of assessment. Discussions with our Subject Matter Experts in October 2020 supported ‘at least 10 occasions’. There has been some feedback regarding potential animal welfare and ‘excessive use of animal’ concerns around this number and potential impacts on RTOs in one particular state. Advice was sought from the Subject Matter Experts (industry and RTOs) about this issue. The SMEWG discussed and supported the following wording:</p> <p>There must be evidence that the individual has successfully artificially inseminated at least ten separate animals with an accuracy of over 85 percent, and has:</p> <ul style="list-style-type: none"> prepared for insemination prepared equipment and work sites correctly selected and thawed semen for insemination

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
	<p>TGA is listing the skill set was deleted 12/Feb/2021 The skill set is listing the unit which has been deleted. AHCPLY305 Beak tip poultry. TGA lists the unit as deleted 12/Feb/2021 Feedback has been directly provided from WA training council; Food, Fibre and Timber Industries and other WA stakeholders We look forward to seeing Draft 2.</p>
	<ul style="list-style-type: none"> • restrained and inseminated animals using species specific techniques and recognised methods that reduce stress • completed documentation and records • cleaned work area and equipment • followed relevant workplace health and safety and environmental and biosecurity legislation, regulations and workplace procedures • followed workplace animal welfare and hygiene practices. <p>Regarding the Skill Set and unit for Beak Tipping: You are correct – the unit and Skill Set were deleted from TGA 12 Feb 2021 in response to the VET Reform directives that Training Package components be deleted if they have low enrolments over a number of years. We are aware of this but as these components are not within the Animal Reproduction project scope, we have not addressed this issue within the current project. Feedback form the IRC is that the skill set may still be required and further investigation is necessary. This Skill Set will be considered in a future project.</p>

Summary of feedback received on Industry Reference Committee questionnaire

A priority for Skills Ministers in 2021 is to ensure employers' and learners' needs can be met through the VET system by reducing the complexity of the training system and improving accessibility of training. One of the key considerations is whether there is a need for formal training of skills through the VET system to achieve competency in the job role.

Enrolment numbers are a key piece of evidence to indicate the need for formal VET training. There may be a number of explanations for low enrolment numbers in a unit of competency, skill set or qualification, and the AISC are asking industry to confirm whether low enrolment numbers are an indication of lack of industry need, or whether there may be reasons for keeping the relevant skill in the formal training system in spite of low enrolment numbers.

Initially, a cut-off point for specific review of units has been set at fewer than 42 enrolments in each of the last three years. Several of the units and qualifications being reviewed as part of this project have been identified as meeting this criteria between 2015 – 2019. The AISC will consider industry viewpoints for maintaining these, backed up by evidence of future enrolments as reasons for them to be retained. To help guide the AISC decision, the Industry Reference Committee sought stakeholder feedback regarding the following factors

- Whether units proposed for retention are core to qualifications being retained?
- Are there linkages with industrial and legislative arrangements?
- Are enrolments expected to increase in the near future? And if so, why?
- Is there employment growth in the skills outlined in the unit/qualifications? And if so, why?
- Is there another specialist requirement to keep the unit/qualification?

Feedback was collected via a questionnaire. Responses to the questions were considered by the Amenity Horticulture, Landscaping, Conservation & Land Management Industry Reference Committee, with the IRC meeting and voting on the retention/deletion of these components.

The following is a summary of the feedback received and IRC decision regarding this questionnaire.

Stakeholder Feedback	
General Feedback	
<ul style="list-style-type: none"> • Industry, SA 	<p>Retain piggery components</p> <p>It would appear to me that there may still be sufficient demand for the three pig industry units of competency to continue even though numbers enrolled do not quite reach the suggested threshold.</p> <p>There is no doubt that there are many less piggeries than in the past but the remaining ones are generally quite large which could indicate an ongoing need. I have looked at the web page which is collating feedback.</p> <p>I do not feel qualified to comment on an industry that I am not directly involved with.</p> <p>Feedback from pig producers is vital in this instance.</p>
<ul style="list-style-type: none"> • Industry Association, WA 	<p>Delete all proposed for deletion components</p> <p>XXX provided feedback on the units proposed for deletion. She said proposed deletion of the listed units will not affect the goat industry in WA so she is OK if they get deleted. Any AIS requirements could be addressed by Eastern state technicians or covered under Vet science programs.</p>

Stakeholder Feedback	
<ul style="list-style-type: none"> Industry Association, NSW 	<p>Retain all proposed for deletion components</p> <p>XXX provided feedback on Proposed for Deletion components. His main statement is that industry does need these skills but that there are no RTOs providing them. "where do you go to learn those skills", "Ag RTOs are being cut back so no training facilities to provide the training eg Scone is marked for closure". Also alluded that there are lots of little pilots and courses, but the industry needs a comprehensive approach to training and to use the same language. Recommended informing the Cattle Council, MLA, Red meat advisory council and Dairy Industry of Aust about these deletions. Also alluded that there are no qualified industry people available/interested to train/assess.</p>
<p>Questions:</p> <ol style="list-style-type: none"> In my opinion, AHC50216 Diploma of Pork Production should be: Deleted Retained Please provide reasons for your answer Are enrolments expected to increase in the near future? Please give reasons for your answer. Is there employment growth in the skills outlined in the AHC50216 Diploma of Pork Production? Please give reasons for your answer. Is there another specialist requirement to keep the AHC50216 Diploma of Pork Production? Please give reasons for your answer. Is this AHC50216 Diploma of Pork Production linked to industrial and legislative arrangements? Please provide your comments/examples. 	
<ul style="list-style-type: none"> Industry, QLD 	<p>Retain</p> <p>Retain this qualification. We have 1 student currently enrolled but will remove from scope once completed (July 2021)</p>
<p>Questions:</p> <ol style="list-style-type: none"> In my opinion, AHCAIS301 Collect semen should be: Deleted Retained Please provide reasons for your answer Are enrolments expected to increase in the near future? Please give reasons for your answer. Is there employment growth in the skills outlined in the AHCAIS301 Collect semen? Please give reasons for your answer. Is there another specialist requirement to keep the AHCAIS301 Collect semen? Please give reasons for your answer. Is this AHCAIS301 Collect semen linked to industrial and legislative arrangements? Please provide your comments/examples. 	
<ul style="list-style-type: none"> Industry, QLD 	<p>Delete</p> <p>Delete unit No demand</p>
<ul style="list-style-type: none"> RTO, QLD 	<p>Retain</p> <p>Retain unit Regulations of reproductive tasks and roles gradually increasing because of demand for services, move away from using qualified vets, increased animal welfare, production assurance e.g., traceability. Enrolments likely to increase over 3-5 years. Potential for Reproduction Skill Set (collection, preg testing, insemination and spaying)</p>
<p>A Decision was sought from the IRC, 6 voted to delete unit, 3 voted to retain unit, 1 abstained from voting (not area of expertise) - Action: Delete</p>	
<p>Questions:</p> <ol style="list-style-type: none"> In my opinion, AHCAIS302 Process and store semen should be: Deleted Retained Please provide reasons for your answer Are enrolments expected to increase in the near future? Please give reasons for your answer. Is there employment growth in the skills outlined in the AHCAIS302 Process and store semen? Please give reasons for your answer. Is there another specialist requirement to keep the AHCAIS302 Process and store semen? Please give reasons for your answer. Is this AHCAIS302 Process and store semen linked to industrial and legislative arrangements? Please provide your comments/examples. 	

Stakeholder Feedback	
• Industry, QLD	Delete Delete unit No demand
• RTO, QLD	Retain Retain unit Regulations of reproductive tasks and roles gradually increasing because of demand for services, move away from using qualified vets, increased animal welfare, production assurance e.g., traceability. Enrolments likely to increase over 3-5 years. If non-natural breeding required to restore herd numbers in the next 2 years
A Decision was sought from the IRC, 7 voted to delete unit, 2 voted to retain unit, 1 abstained from voting (not area of expertise) - Action: Delete	
Questions: 1. In my opinion, AHCAIS401 Supervise artificial breeding and embryo transfer programs should be: Deleted Retained 2. Please provide reasons for your answer 3. Are enrolments expected to increase in the near future? Please give reasons for your answer. 4. Is there employment growth in the skills outlined in the AHCAIS401 Supervise artificial breeding and embryo transfer programs? Please give reasons for your answer. 5. Is there another specialist requirement to keep the AHCAIS401 Supervise artificial breeding and embryo transfer programs? Please give reasons for your answer. 6. Is this AHCAIS401 Supervise artificial breeding and embryo transfer programs linked to industrial and legislative arrangements? Please provide your comments/examples.	
• Industry, QLD	Retain Retain unit Demand is still there
• RTO, QLD	Retain Retain unit Regulations of reproductive tasks and roles gradually increasing because of demand for services, move away from using qualified vets, increased animal welfare, production assurance e.g., traceability. This will see a slow increase in training delivery in various units Difficult to predict future enrolments as drought has negatively impacted activity and breeding levels. Required for pathway beyond level 3
A Decision was sought from the IRC, 10 voted to retain unit, 0 voted to delete unit - Action: Retain	
Questions: 1. In my opinion, AHCLSK302 Mate and monitor reproduction of alpacas should be: Deleted Retained 2. Please provide reasons for your answer 3. Are enrolments expected to increase in the near future? Please give reasons for your answer. 4. Is there employment growth in the skills outlined in the AHCLSK302 Mate and monitor reproduction of alpacas? Please give reasons for your answer. 5. Is there another specialist requirement to keep the AHCLSK302 Mate and monitor reproduction of alpacas? Please give reasons for your answer. 6. Is this AHCLSK302 Mate and monitor reproduction of alpacas linked to industrial and legislative arrangements? Please provide your comments/examples.	
• Industry, QLD	Delete Delete unit

Stakeholder Feedback	
	No demand
• RTO, QLD	Delete Delete unit Cannot respond – not relevant to our operations
A Decision was sought from the IRC, 10 voted to delete unit, 0 voted to retain unit - Action: Delete	
<p>Questions:</p> <ol style="list-style-type: none"> 1. In my opinion, AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle should be: Deleted Retained 2. Please provide reasons for your answer 3. Are enrolments expected to increase in the near future? Please give reasons for your answer. 4. Is there employment growth in the skills outlined in the AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle? Please give reasons for your answer. 5. Is there another specialist requirement to keep the AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle? Please give reasons for your answer. 6. Is this AHCLSK335 Conduct dropped ovary technique procedures for spaying cattle linked to industrial and legislative arrangements? Please provide your comments/examples. 	
• Industry, QLD	Delete Delete unit Low demand
• RTO, QLD	Retain Retain unit This unit is critical to a new Qld accreditation system which will pass Parliament in mid-2021. The scheme provides an accreditation pathway for non-vet spayers based on attaining competency in this unit. The industry has funded the development of and pilot testing of new training and assessment resources and RPL systems for this unit to commence later in 2021. Enrolment growth expected in future as all lay spayers in Qld will have to obtain this unit from later in 2021 onward. Other states will likely follow suit. Employment growth expected as spaying is a critical husbandry activity across Northern Australia in the large grazing herds of the grass fed beef industry. Specialist requirement as in future it is proposed to have a reproductive skills pathway for AI, preg. testing and spaying services. Legislation and regulation in Qld has been drafted requiring all non-vets to obtain accreditation based on this unit. Failure to retain this unit will be a disaster for this scheme and the 3 years of work that has been dedicated to getting it to the starting line. Please check with Qld Department of Agriculture (Biosecurity Qld if you need details). Or we can supply a copy of the accreditation scheme, training and learner resources etc.
A Decision was sought from the IRC, 8 voted to retain unit, 1 voted to delete unit, 1 abstained from voting (not area of expertise) - Action: Retain	
<p>Questions:</p> <ol style="list-style-type: none"> 1. In my opinion, AHCLSK507 Plan, monitor and evaluate strategies to improve livestock through genetics should be: Deleted Retained 2. Please provide reasons for your answer 3. Are enrolments expected to increase in the near future? Please give reasons for your answer. 4. Is there employment growth in the skills outlined in the AHCLSK507 Plan, monitor and evaluate strategies to improve livestock through genetics? Please give reasons for your answer. 	

Stakeholder Feedback	
5. Is there another specialist requirement to keep the AHCLSK507 Plan, monitor and evaluate strategies to improve livestock through genetics? Please give reasons for your answer. 6. Is this AHCLSK507 Plan, monitor and evaluate strategies to improve livestock through genetics linked to industrial and legislative arrangements? Please provide your comments/examples.	
• Industry, QLD	Retain Retain unit I don't know
• RTO, QLD	Retain Retain unit Unable to comment on this unit
A Decision was sought from the IRC, 10 voted to retain unit, 0 voted to delete unit - Action: Retain	
Questions: 1. In my opinion, AHCPY301 Artificially inseminate poultry should be: Deleted Retained 2. Please provide reasons for your answer 3. Are enrolments expected to increase in the near future? Please give reasons for your answer. 4. Is there employment growth in the skills outlined in the AHCPY301 Artificially inseminate poultry? Please give reasons for your answer. 5. Is there another specialist requirement to keep the AHCPY301 Artificially inseminate poultry? Please give reasons for your answer. 6. Is this AHCPY301 Artificially inseminate poultry linked to industrial and legislative arrangements? Please provide your comments/examples.	
• Industry, QLD	Delete Delete unit No demand
• RTO, QLD	Delete Delete unit Unable to comment on this unit
A Decision was sought from the IRC, 8 voted to delete unit, 2 voted to retain unit - Action: Delete	