NSWALC Submission Volume 2

Training Package Technical Issues

Senate Inquiry into Industry Skills Councils

Outstanding issues with the AHC10 Training Package and component merged packages

Executive Summary

The proposed merger of the three AgriFood training packages has been the avoidance mechanism for implementing the three Phase 1 and Phase 2 review recommendations. Stakeholder feedback from these reviews has been, in practical terms, largely ignored and implementation of feedback has not been done, or has been poorly or partially done or is incomplete. The AHC10 review phase is a very poor substitute for the intensive and comprehensive reviews of the three existing training packages. The proposed AHC10 training package does not incorporate stakeholder feedback, does not represent current stakeholder need and does not have key stakeholder endorsement.

The following report documents a history of poor communications, inadequate, incomplete or nil consultation with stakeholders, non representation of key stakeholder and equity groups, and non completion of training package reviews and recommendations. The report highlights a recurrent theme of avoidance of the prescribed work for an Industry Skills Council.

The report also showcases the attributes of the corporation known as AgriFood Skills Australia for three key failings in dealing with client and stakeholder groups for their lack of timely action, lack of adequate or accurate responses and lack of accountability to their stakeholder groups and their controlling government authorities. The report also points to this Industry Skills Council as recalcitrant and recidivist in their haphazard and unprofessional approach to consultation of key stakeholders. It is apparent that AgriFood Skills Australia is a chronic repeat offender with respect to consultation techniques and methodologies and incorporating feedback into Training package products.

Finally the training package project management can be easily assessed as incompetent in meeting the requirements for quality training package product development. The corporate management can be evaluated as lacking in corporate governance and failing to meet key performance criteria prescribed for an Industry Skills Council.

Summary of the level of completion of the AHC10 Training Packages	Due for completion	March 2010
RTD02 Conservation and Land Management Training Package Phase 2 Review	**2007**	Not initiated.
Incorporation of recommendations from Phase 1 Review	**2007**	Not done.
RTE03 Rural Production Phase 2 Review	**2008**	Not initiated.
Incorporation of recommendations from Phase 1 Review	**2008**	Not done.
RTF03 Amenity Horticulture Phase 2 Review	**2008**	Not initiated.
Incorporation of recommendations from Phase 1 Review	**2008**	Not done.

RTD02 Conservation and Land Management Training Package Phase 2 Review
Phase 1 completed - December 2005.

Section 1 reports on the process, findings and recommendations of the Phase 1 Environment Scan as required in the AFISC Project Brief.

Phase 2 – never completed.
• Implementation of agreed recommendations as presented in the Phase 1 report
• Validation of enhancements and rationalisation actions
• Final report

Section 2 contains detailed recommendations and proposed plan for undertaking Phase 2 of the Training Package Review which was never undertaken and remains incomplete to this day.
 General comments and recommendations

RTD02 Training Package Review Phase 1 Final Report December 2005	March 2010
There are areas that will need significant work in Phase 2. Many concerns were expressed about misinterpretation, inconsistent standards in delivery and outcomes and inflexible packaging rules.	
a key focus of Phase 2 will be the need for:	
● increased flexibility,	Done.
● reduced duplication	Not done.
● and greater clarity in the intent and language of Units of Competency.	Not done.
The revised Package will need to reflect:	
● emerging occupational streams,	Not done.
● changing job roles	Not done.
● and new technologies.	Not done.
Additionally, Phase 2 will involve the:	
● embedding of employability skills	Not embedded.
● and incorporation of AFISC's Rationalisation Framework (continuous improvement strategy).	Not done.

Emerging job roles June 2006	New qualifications of skill sets developed by March 2010
Management of weeds and pests will continue to be a growth industry	Not done.
the management of overabundant native species (cockatoos, kangaroos, and crocodiles)	Not done.
Areas in mainland Australia where there is high ecotourism potential and the same wildlife viewing opportunities as Tasmania or Kangaroo Island	Not done.
Increasing emphasis on regular targeted surveillance by remote Aboriginal Ranger groups (on behalf of AQIS) – Customs and quarantine reporting	Not done.
Quarantine autopsy	Not done.
Wildlife harvest collection	Not done.
Indigenous enforcement of illegal activities	Not done.
Facilitating Aboriginal people to manage their lands sustainability	Not done.

Skills sets	
Skills sets	
Good fields skills eg experience in safe use and recovery of ATV's, chainsaw, winching skills, handling/marking wildlife, and handling poisons and baits	Not done.
Senior first aid certificate	Not done.
Defensive driving	
Technology skills (Word, Excel, Access)	
and an ability to adapt to newer technology eg Arcview	Not done.
Documentation, report card writing skills	Not done.
Better community engagement – need for good interpersonal and mentoring skills and ability to deliver a message successfully to different audiences	Not done.
Mediation and conflict management skills	Not done.
Liaison with government departments, agencies and neighbouring communities	
Developing indigenous tourism products	Incomplete
Culturally appropriate view of land management techniques	Incomplete
bush survival skills	Incomplete
recognition and diagnosis of key exotic diseases	Partially done.
ecological impact of feral animals and their control	Not done.
evaluating potential wild harvest plant material for domestic and international markets	Unknown
increasing production of wild harvest through management	Unknown
helicopter escape training	Not done.
skills in use of multimedia	Not done.
recognise key exotic disease in feral animals	Partially done.
field skills associated with disease surveillance, collecting samples, effective and safe hunting and shooting skills	Not done.
higher level skills to carry out post mortem examination of feral animals, collect and process samples, and recognize particular targeted exotic disease in these animals	Not done.
source funding and application writing skills	Not done.
budgeting and financial management	Not done.
Triple bottom line planning and reporting	Not done.
	Not done.
Legislation, regulatory or licensing requirements	
Accountability in the use of toxins	Not done.
Regulatory requirements under OHS underline the need for specific skills to safely carry out field work with feral animals, quad bikes, firearms in very remote areas	Done.
Legal requirements and controls on the export of plants and animals	Not done.
	Not done.
New skill areas needed	Not done.
Joint management skills for indigenous park owners	Not done.
Enforcement skills for indigenous people managing their lands	Not done.
Understanding satellite and scientific material and the use of new equipment	Not done.
Designing and producing indigenous cultural tours specializing in areas ranging from indigenous land management techniques to craft making or hunting	Not done.
Understanding organic products and markets	Not done.
Enforcement training	Not done.
Quarantine work and sustainable wildlife harvest	Not done.
Emergency management – fire, whale stranding, diseases	Not done.
Management and legalities of new and emerging wild harvest species, viability testing, research and marketing	Not done.
Compliance skills	Not done.
Governance	Not done.

	Not done.
Identified Skills Clusters	
Technology – GPS/GIS	Not done.
Chainsaw training	Not done.
Basic field work and test procedures	Not done.
Law and Legislation (eg for Park Rangers etc)	Not done.
Corporate governance	Not done.
Revegetation/Rehabilitation	Not done.
Pest Management	Done.
Fire Ecology/Management	Partially done.
Conservation Planning	Not done.
Water and Coastal Management	Not done.
'ACDC Ticket'	Not done.
Chemical Users courses	Done.
SMARTtrain Chemical Accreditation Program	Done.
Respond to Wildlife Emergencies	Not done.

AFISC Indigenous Engagement Project feedback was provided December 2005	**March 2010**
Recognition that different laws cover the treatment of indigenous species e.g. capture of animals for zoos/research as opposed to a food source such as crocodiles and crocodile eggs, turtles and turtle eggs	No new units of competency or skill set development has occurred.
Harvesting of trees for didgeridoo making – further investigation required	No new units of competency or skill set development has occurred.
The lines between fishing/aquaculture/CLM are blurring with the advent of indigenous enterprises e.g. sea sponges	No new units of competency or skill set development has occurred. No new aquaculture units were imported.
Examples relating to above include turtles (breeding stock – animal husbandry, turtles and eggs food sources, incubating eggs to produce hatchlings for sale to pet shops or repopulation of areas for biodiversity)	No new units of competency or skill set development has occurred.
Skills sets/skills passport approach to training was particularly strong with the communities and those that service/support their training needs	No new skill set /skills passport development has occurred.
Indigenous business management in the CLM context also seems to have links to tourism	No new units of competency or skill set development has occurred.

Source: N Jacobsen, Dane Consulting: Notes from report on Indigenous Engagement Project, AFISC, 2005

"Based on the initial results of the Indigenous Engagement Project there have not been any significant problems with the CLM Training Package in terms of appropriateness or otherwise for indigenous communities, however, "**a number of key stakeholders have expressed concerns about the ability of the current Package to meet the needs or aspirations of indigenous people**."

"Our research established that there are divergent points of view about aspects of the Package and how CLM is/should be implemented to best meet the needs of indigenous communities. (See the Issues Register at Appendix 1). These issues will be followed up in the Phase 2 Review. See Recommendations 14-16 in Section 2 of this report." **RTD02 Training Package Review Phase 1 Final Report December 2005 NB. The Phase II Review was not initiated and remains incomplete.**

RTD02 Phase 2 Review	Not done.
Incorporation of recommendations from Phase 1 Review	Not done.
Issues Register at Appendix 1.	Register was not done
These issues will be followed up in the Phase 2 Review	Not done.
See Recommendations 14-16 in Section 2 of this report	Recommendations 14-16 not published and not done.
See Recommendations 14-16 in Section 2 of this report	Section 2 of this report not published and not done.

RTE03 Rural Production Training Package Phase 2 Review

	March 2010
Units have been categorised using an Integrated Framework model	Not done.
Selection of replacement or new imported units of competency will be made as a unit by unit decision, taking into consideration the needs of other AFISC Training Packages to avoid possible duplication of similar units of competency.	Incomplete as numerous duplications exist.

Employability skills

	March 2010
AgriFood Industry Skills Council has had the Quadrant 3 and 4 units of competency analysed for employability skills and the information mapped against employability skills definitions. This information will be presented in the Introduction of the Training Package.	Not done.
During Phase 2, the Developer will use this ES mapping tool to identify units of competency that required additional employability skills to be written in.	Not done.
This work will be undertaken during Phase 2 of the review	Not done.
This work will be validated with stakeholders.	Not done.

Equity review recommendation June 2006	Proposed action June 2006	March 2010
1 Include information in the introduction to the Training Package about the nature of the workforce, as per the equity evaluation checklist It should recognise and positively connote the place of equity groups in the industry and their potential to play a full and significant part in the full range of occupational opportunities that exist	Ensure that this information is included in the Introduction section of the Training Package unless otherwise recommended by AFISC.	Not done.
2 Ensure Steering Committee members who have access to equity representatives seek feedback	Steering Committee members and the review team to seek feedback from as wide and diverse	Not done.

from these representatives for input into the Training Package review during phase two	a section of stakeholders as possible and specifically seek the views of representatives of equity groups.	
3 Ensure that stakeholders representing equity groups are consulted during Phase 2 of the review process and that consultation is timely and carried out in the most appropriate way	Equity groups will be specifically invited to participate in review processes and in a manner that best suits them.	Not done.
4 Ensure language, literacy and numeracy skills are covered fully in new units of competency developed for the review of the Seafood Industry Training Package	New RTE units included in the TP will be reviewed to ensure that LLN skills are fully covered where achievement of workplace outcomes require them.	Not done.
5 Allow for inclusive practices within relevant units of competency.	All RTE units included in the TP will be reviewed to ensure that inclusive practices are included where workplace requirements allow.	Not done.
6 Ensure that relevant legislation, codes of practice and standards are specifically referred to and that the extent of knowledge is stated.	All RTE units included in the TP will be reviewed to ensure that the appropriate level of knowledge of legislation and regulation is noted in the evidence guide and that a broad description of the type of legislation is included (eg legislation and regulations covering quarantine).	Incomplete and imprecise.
7 Include advice on the assessment of equity groups in method of assessment or guidance information for assessment sections of the evidence guide, subject to further advice from the equity evaluator.	Advice will be included in line with AFISC policy.	Not done.
8 Include resources/sources of information (to be developed by the equity evaluator) to do with the assessment of equity groups in the Assessment Guidelines.	Information being provided by the Equity audited (or) will be included in the Introduction to the Training Package.	TBA

Skill sets
As part of the RTE Training Package review Phase 1 were required to identify potential skill sets. [**June 2006**]

RTE03 Training Package Review Phase 1 Final Report pp 63-66 June 2006	Skill Set developed
Category Title Competencies Rationale / follow up actions	
1. Advisor	
a) Wool Advisor	Not done.
Marketing Clip preparation Communication skillls Potential career path to work as a wool advisor	
2. Animal care	See ACM09
a)	
3. Business	
a) Market horticulture produce	Not done.
4. Chemical use	Done
a) Accredited Chemical Use RTC1701A, RTC 2706A, RTC3704A, RTC3705A AND RTC4703A Competencies required by SA Chemcert ticket linked to state legislation	In above.
b) Spray application	In above.

c) Chemical User (align with old FCUC and relevant RTC units)	In above.
5. Dairy/milk harvesting	
a) Relief milker	Not done.
b) Calf rearing	Not done.
6. Harvest/ post harvest	
a) Mushroom harvest An introductory set of units for pickers new to industry OHS big issue. Pickers often NESB, with huge language difficulties; and child care responsibilities; high turnover in workers.	Not done.
b) Grain harvesting	Not done.
c) Horticulture harvest+ postharvest operations	Not done.
d) Horticulture post harvest operations	Not done.
e) Fodder conservation	Not done.
f) Grain receival, testing and storage New competencies	Not done.
g) Organic recycling Commercial composting Use in place of qualification (DPI Vic)	Not done.
h) Seasonal induction OHS, skills	Not done.
7. Horse breeding	
a) Yearling preparation Basic health, handling and weaning of yearlings, preparing and presenting at sale (handle young horses)	Not done.
b) Foaling attendant RTE3121A Unit on parturition, birthing duties, basic health	Not done.
8. Human resource management	
a) Training and assessment units	Not done.
b) HR Recruitment, and selection, training and managing teams, succession planning and staff retention	Not done.
9. Irrigation	
a) Cf Irrigation Certifications Supported by industry – Oasis, Gimbells (NT), DPI Vic, use irrigation skill sets in place of qualifications	
b) CF Irrigation Manager	Incomplete
c) CF Irrigation Operator	Incomplete
d) CF Irrigation Installer	Incomplete
10. Leadership	
a)	Unknown
b)	Unknown
11. Machinery	
a) Poultry Machinery Operator Specialist poultry machinery and equipment	Not done.
b) GPS Guidance and yield mapping, Controlled Traffic - PH Incl GPS	Not done.
c) GPS Guidance and yield mapping, Controlled Traffic - Ag	Not done.
d) GPS Guidance and yield mapping, Controlled Traffic - Irrigation	Not done.
e) Contractors – spray, header, header operation, fencing, fodder conservation	Not done.
f) Certified machinery operator Levels 1, 2 and 3. For machinery operators in large enterprises	Not done.
g) Rural Mechanic – tractor operator	Not done.
12. Production - crops	
a) Cotton Basics Check on NSW courses	Done
b) Cotton Advance	Not done.
c) Cotton Seed	Not done.
d) Cropping	Not done.
e) Soil/agronomy management	Not done.
13. Production –intensive livestock	

a) Poultry hatchery manager/supervisor	Not done.
b) Breeder (poultry) farm manager/supervisor	Not done.
c) Broiler farm manager/supervisor	Not done.
d) Caged layer farm manager/supervisor	Not done.
e) Barn egg farm manager/supervisor	Not done.
f) Free range egg farm manager/supervisor	Not done.
g) Free range broiler farm manager/supervisor	Not done.
h) Organic egg farm manager/supervisor	Not done.
i) Organic broiler farm manager/supervisor	Not done.
j) Feedlotting	Not done.
14. Production -livestock	
a) Herd Improvement - Recording, semen production, artificial breeding Applicable to sheep or any other livestock.	Not done.
One skill set or 3	Not done.
15. Rural bus. management	
a) Marketing	Not done.
b) Succession planning	Not done.
c) Business governance	Not done.
16. Sales and services	
a) Stock handling in saleyards and abattoirs OHS, QA and stock handling National Saleyards Quality Assurance NSQA Check meat package	Not done.
b) Rural merchandising	Not done.
17. Sheep/wool	
a) Crutching and mulesing From the experience of woolgrowers, shearing contractors, shearers, woolclassers and shedhands what is required is "a set of skills" that will provide, based on agreed competencies, a person with the abilities and then hence the opportunity to become a valuable and skilled member of a wool harvesting team.	Not done.
b) Shearing Levels	Not done.
c) Sheep experting Mustering, trimming hooves, handling livestock, mouthing and ageing, drench and vaccinate, mules, shear and dip, back lining	Not done.
d) Wool classing	Qualification
18. Sustainability	
a) Organics recycling Commercial composting	Not done.
b) Biosecurity	Not done.
19. Systems	
a) Developing a QA system Quality assurance, logistics, supply chain OHS EMS, QA, HACCP	Not done.
b) Monitor QA system	Not done.
c) Integrated management system	Not done.
20. Transport	
a) Grain transport	Not done.

Other Skill Sets Developed in AHC10

Pork Industry Stockperson Skill Set	Done
Irrigation Retailer Skill Set	Incomplete
Irrigation Agronomist Skill Set.	Incomplete

RTE03 Appendix 1 Consultation register June 2006		
For privacy reasons only organisation names have been listed.	Note that many organisations contributed through multiple individuals, and some organisations collated the feedback from their members.	Note the absence of Indigenous and Equity group organisations and representative bodies.
Organisation	**Organisation**	**Organisation**
Ag Consulting	Enchanted Isle Farms	OTTE
Animal Health Australia	Environment Protection Authority (NSW)	Partners in Grain
ARRIS	Goulbourn Ovens TAFE	PIRSA, Rural Finance and Development
AusGrow	Grains Industry Training Network (GITN)	Poultry Works
Australian Milking Machine Trade Association	Growcom	Primary Industry Skills NT
Australian Mushroom Growers Association	Horticulture Australia Council	Primary Skills SA
Australian Poultry CRC	Horticulture Skills	Primary Skills Victoria
Australian Women in Agriculture	Irrigation Association of Australia	QAF Meat Industries
Australian Wool Exchange	Irrigation Association of Australia WA	QLD Dept Industrial Relations - OHS
Australian Wool Innovation Ltd	Irrigation Futures	Queensland TAFE
AusVeg	Consultant/Trainer	Regional Skills Training Australia
Biodynamics Education Center	Irrigation industry supplier	Rimfire Resources
Charles Darwin University	Dairy farmer	RITE
Cherry Growers of Australia	Longerenong College (WorkCo Ltd)	Riverland Horticulture Council
Cherry Haven	Mackay Cane Growers	Rural Industry Training and Education (Tasmania)
Construction & Property Services ISC	Murrumbidgee Rural Studies Center	Rural Skills Australia
Cotton Catchment Communities CRC	NAPLO	Rural Training Consultants of Australia
Cotton Research and Development Center	National Centre for Dairy Education	South West TAFE
Curtin University	National Herd Improvement Association of Australia	Sunraysia Institute of TAFE
Dairy Australia	NMIT	TAFE SA
Department of Primary Industries	North Melbourne Institute of TAFE	Tocal College
Dept Employment, Education and Training,	NSW TAFE	University of Ballarat
DosAqua	NT Correctional Services	VFF Livestock Group
DPI Victoria	NT Horticulture Association	WA Agriculture College
Education Center Gippsland	Oasis Irrigation	Wagga Wagga High School

Selected specific issues: 1.   Biosecurity

RTE03 Training Package Review Phase 1 Final Report pp 16 & 29 June 2006

Group 1: Identified needs and feedback Proposed actions June 2006	March 28, 2010	March 28, 2010
1. Practices and concepts: Biosecurity awareness and emergency response capability as mandated by the federal government and administered by Animal Health Australia and Plant Health Australia, and state / territory agencies. PHA and AHA have requested the addition of PUA (public safety) and PSP (government) competencies to support emergency response by both industry and government agencies.**June 2006**		
i) Update relevant animal and plant competencies as applicable with appropriate biosecurity references in line with AUSVETPLAN or PLANTPLAN. **June 2006**	The application of biosecurity references is inconsistent and incomplete.	Incomplete. **March 28, 2010**

ii) Include specific units from PUA and PSP as requested by AHA. (Some were included in the RTE Extension.) **June 2006**	The PUA and PSP units were not imported.	Not Done. **March 28, 2010**
iii) Identify skill sets to ensure a pathway for skill/knowledge development and recognition. **June 2006**	No skill sets were identified. Biosecurity Auditor Skill Set has been identified and mapped for inclusion as a Skill Set.	Not Done. **March 28, 2010**
Recommendations: **June 2006** 1) Inclusion of units making generic emergency response from Public Safety TP: PUAOPE004A – Conduct briefings/debriefings PUACOM007A – Liaise with other organisations PUAMAN008A – Manage physical resources	The Public Safety units have not been imported.	Not Done. **March 28, 2010**
2) Biosecurity principles will be included in relevant competencies and competencies on development and implementation of biosecurity plans for industry will be identified and included.**June 2006**	The application of biosecurity principles is inconsistent and incomplete. New units produced on the development and implementations of biosecurity plans do not meet the industry requirements.	Not Done. **March 28, 2010** Not Done. **March 28, 2010**
3) And where relevant animal welfare considerations and compliance with various industry Codes of Practice will be included in relevant competencies. **June 2006**	The application of animal welfare considerations is inconsistent and incomplete. Compliance of units with industry Codes of Practice of AUSVETPLAN or PLANTPLAN is inconsistent or incomplete.	Not Done. **March 28, 2010**

Follow-up Case Study – Biosecurity – Nov 2009 - selected as a high priority area of strategic national importance.

Animal Health Australia (AHA) confirmed that there had been no consultation over the period June 2006 to March 2010. AHA also commented that changes made to the relevant units were not as requested and did not meet the strict requirements that the biosecurity industry needed.

Animal Health Australia and Plant Health Australia – Feedback part 1
AHCBIO302A Monitor and review Biosecurity measures – range statement only for pigs & poultry; should this be extended to other agricultural animal species, eg horses, in light of recent equine flu and Hendra outbreaks?
AHCBIO304A Carry out movement and security procedures – Competency Field should be Biosecurity, not Wool
While I haven't received a reply to my earlier message yet, I am assuming that the new unit AHCBIO403A Plan and implement a tatement l program1.doc which I found in the list of units has been written in place of the two units highlighted below. Is this right? Can you please let me know who/which organisation provided the input?   As I foreshadowed, Animal Health Australia will have a number of comments to make, but I felt I should alert you immediately to my concerns that your proposed treatment of the Range of variables (or omission of them to be more accurate) has resulted in all reference to AUSVETPLAN and PLANT PLAN being removed. These are vital documents that must be referenced in the units of competency. Leaving them out and altering the evidence guide has resulted in units of competency that do not reflect the requirements of the national animal health system and in particular the emergency animal response program.   Also, I cannot find any reference to the Biosecurity focus area in any of the qualifications proposed for the training package. I do not see how someone would know that such units existed and could be used within a qualification if there is no mention of them. Perhaps you are planning to address this in another part of the training package that is still being prepared? If so, when will this be available for review by stakeholders?

Animal Health Australia and Plant Health Australia – Feedback part 2

BIOSECURITY
Rather than provide detailed feedback on the errors and omissions in each unit of competency, in most cases more general comments are provided. We are sure that all errors and omissions can be addressed simply by using the content from the current units of competency that were agreed to by those industry organisations and jurisdictions with a role in emergency animal disease or plant pest incursion responses.

Unit descriptor
Changes have been made to the unit descriptors. These changes do not appear to follow any pattern or rationale and therefore the original content should be restored.

Unit sector
Since this field is blank in all cases, what is its purpose?

Range statements
The great majority of range statements have been omitted. **This has serious implications** as the range statements contain important guidance about the application of these units and their removal has resulted in the deletion of references to AUSVETPLAN and PLANTPLAN. Details such as these cannot be adequately addressed by referring to separate, non-endorsed guidance material that is yet to be written.

The content of the retained range statements have in some cases been altered and, for example in **AHCBIO301A** and **AHCPMG305A**, references to pest plants have been added. Pest plants (it is assumed that this refers to weeds) are not addressed under nationally agreed emergency response arrangements and so should be removed from these and any other emergency responses unit into which they have been added.

All range statements from the current units of competency must be retained. Should the AFISC 'model' for the proposed units of competency not allow this, then the elements and performance criteria of the unit of competency will need to be rewritten to incorporate the essential content that has been deleted.

Evidence guide
Critical aspects
These have been changed and in some cases replaced with underpinning skills or other content. The original content **must be** retained.

Context and method of assessment
Assessment in these units of competency may result in the award of an AUSVETPLAN or PLANTPLAN role. The current units of competency were developed with that purpose at the forefront to ensure confidence in the assessment of people who could be engaged in emergency disease/plant pest responses across all jurisdictions.
The original content has been replaced with what appears to be generic text. The original content must be retained as this provides essential advice on how assessment should be conducted to meet the requirements of the national animal and plant health systems.

AHCPMG305A Identify and report unusual disease or plant pest signs
This unit was originally designed for lay personnel to recognise something unusual. It was never intended that people undertaking the unit would have a knowledge of 'plant, animal, bird and fish diseases'. The new references to knowledge of diseases and symptoms and signs are misleading and should be deleted.

AHCBIO403A Plan and implement a biosecurity program
This proposed unit would have much greater applicability if it were reworded to cover all types of enterprises, not just intensive livestock production. If AFISC wishes to retain this particular emphasis, then the unit title should be changed to reflect this more restricted application.

AHCBIO601A Plan and oversee an emergency disease or plant pest control program
This unit is not available for comment, although it is listed in the Unit register.

Concluding remarks
Both Animal Health Australia and Plant Health Australia seek assurance from AFISC that the proposed changes to currently endorsed units of competency relevant to emergency animal disease and plant pest incursion response will not be implemented without due consideration of the concerns expressed above or without due consultation with the Animal Health Australia and Plant Health Australia as the key national stakeholder bodies responsible for training responders to implement Australia's nationally agreed response strategies.

Selected specific issues:

RTE03 Training Package Review Phase 1 Final Report pp 16 & 29 June 2006

Group II: Identified needs and feedback Proposed actions		
5 Practices and concepts: *Environmental management and sustainability principles* are becoming an accepted part of rural production and business operations.		
Competencies require updating with relevant criteria and related knowledge.	Done although simply copied and duplicated imported units.	Partially done.
Competencies specific to EM and sustainability are also required.	Not imported but listed in qualifications.	Partially done
There has also been feedback that natural resource managers/ coordinators would benefit from a better understanding of farm business management.	Some Business units are but Business management units not included in Diploma qualification	Partially done.
The inclusion of biodynamic practices within competencies has also been raised.	Organic units have been developed.	Done.
i) Consider the importation and placement of competencies, including imported units to support sustainability and environmental management across RTE qualifications.	One generic sustainability unit have been placed in most of the qualifications	Partially done.
ii) Investigate whether unit specific to biodynamics in the RTE Extension will meet stakeholder needs		Unknown
iii) Liaise with AFISC developers on imported units	Liaison occurred.	Done.
iv) Review state accredited courses (Salinity in dryland farming from NSW and Vic Dip of Sustainable Agriculture) for relevancy	State accredited courses were not reviewed.	Not done.
v) Identify competencies that require updating	Many identified not all updated.	Partially done
vi) Develop a discussion paper on options for including EM and sustainability principles in the Rural Production Training to go out to stakeholders for feedback	No discussion papers were developed for dissemination	Not done.
vii) Report on findings to RTE Steering Committee, and proposed action	No report was ever produced	Not done.
viii) Follow through with proposed actions	Partially done.	Partially done.

RTE03 Training Package Review Phase 1 Final Report pp 39 June 2006	
In summary, the key areas to be addressed in the review are:	
Horticulture in Australia	
1. Biosecurity (including food security and plant health)	Incomplete.
2. New technologies (eg GIS; fertigation systems, GPS)	Partially done
3. Environmental Management Systems	Not done.
4. Value/supply chain	Not done.
5. Human Capital	Not done.
6. Business Management Systems	Not done.
7. Natural Resource Management (including soil and water)	Done.
8. The regulatory environment	Incomplete.
9. Climate variability.	Not done.
There is also some suggestion that there may be the need for development an Associate Diploma-level qualification in Horticulture. Higher level Diploma and Advanced Diploma for industry development personnel, including extension and facilitator personnel.	Incomplete. One unit in Horticulture exists at AQF 6.
Sources of feedback	
Feedback has been received from RTOs in most states, including an industry RTO. A number of industry representative bodies have provided valuable information about emerging trends and implementation issues.	
Feedback received	

In general feedback has been positive about the production horticulture qualifications.	
The following feedback has been noted for consideration:	
1. RTE4915A Implement and monitor quality assurance program. There should be another higher level unit of competency at AQF 5 titled Develop a Quality Assurance Program	Unit already exists
2. RTF4023A Promote Plant Health is too broad and lacks specific focus on plant health issues directly related to production horticulture. It should be made more industry specific.	Not done.
3. RTD 5402A Develop strategy for management of target pests. The contents for this unit are not relevant to production horticulture. The whole unit must therefore be revised to reflect relevance to production horticulture.	Not done.
4. There is absolutely nothing anywhere on tree physiology, botany, crop growth cycles and development of practices for critical growth stages for various horticultural crops.	Partially done.
5. Nothing on horticultural agronomy and because of this the qualifications have little relevance to jobs in the industry - will therefore not achieve employability.	Not done.
6. For this reason Production Horticulture should be part of RTF 03	Agree.
7. Many of the positions in production horticulture do not have ASCO codes allocated, and this makes them difficult to market overseas. Investigate.	Incomplete
8. Post Harvest handling emerging area to be addressed, also need QA consultants, horticulture consultants and horticulture agronomists.	Incomplete
9. Skill sets	
- Post harvest handling operations	Partially done.
- Development of Q A programs	Not done.
- Monitoring of Q A programs	Not done.
- Marketing of Horticultural produce	Not done.
10. Specific industry skills needed currently:	Not done.
- Industry specific machinery operations such as platforms for pruning of fruit trees and operation of pneumatic secateurs	Not done.
- Forklift license	Done.
- Soil moisture management and irrigation management	Not done.
- Technology skills	Partially done.
- Workplace communication skills	Not done.
- RTF3011A is not suitable for intensive plantings as advised to require a module RTE2010A Establish crops at AQF 3.	Not done.
- Trellising and fencing are a gap in Production Horticulture.	Not done.
11. Horticulture for Tomorrow (EPS) guidelines would form a useful resource both for ensuring competencies are on track and for trainers in delivery. Reference in Introduction to RTE03	Not done.
12. Look at the viticulture, table grape and dried grape sectors to ensure currency with new technologies and appropriateness of competencies.	Not done.
13. There is a need to add an Associate Diploma in Production Horticulture.	Not done.
14. Job profiles not currently addressed by RTE:	
Combined Management Systems Training: ability to manage and combine a range of Management Systems and/or Schemes into a single Business Management System	Not done.
15. *Plant Health – Biosecurity – Pest and Disease Surveillance*:	Incomplete.
Knowledge of the new Plant Health System; Skills in Pest and Disease Surveillance.	Incomplete.
16. Risk management relating to business /finance, environmental factors, climate, human resources and skills capacity.	Incomplete.
17. Emerging areas	Not done.
Biosecurity	
Quality assurance systems	Not done.
Food security	Done.
On farm bio security	Incomplete.
Industry capacity to respond to biosecurity emergencies	Not done.
Value Chain and Business Development	Not done.
Value chain management, relationship management, and partnership development	Not done.
Information management systems	Not done.
Benchmarking systems	Not done.
Marketing	Not done.

Negotiation	Not done.
Financial and business management	Not done.
Export development	Not done.
Legal issues - intellectual property, contracts, licencing	Not done.
Understanding supply chain	Not done.
Human Capital	Not done.
Retirement and succession planning	Not done.
Industrial relations and staff management	Not done.
Leadership and relationship management	Not done.
Skills development	Not done.
Natural Resource Management	
Farm planning and management systems (FMS)	Not done.
Environmental risk assessment	Not done.
Good agricultural practices in particular irrigation, nutrition and soil health management	Partially done
Remote sensing, spatial analysis and precision agriculture techniques	Not done.
Environmental monitoring and assurance	Not done.
Business implications of water planning and trading	Not done.
Water quality management and use efficiencies	Partially done
Climate Variability	Not done.
Natural disaster management plans	Not done.
Climate variability /forecasting planning and management	Not done.
Climate change mitigation strategies and adaptation planning	Not done.
Risk management	Not done.
Spatial data, precision agriculture and information technology tools to support farm planning and day to day farm management (including GPS, GIS)	Not done.
Information management associated with new technologies - look at integrated farm management.	Not done.

Lack of Indigenous and Equity group representation

Indigenous and Equity interests were not catered for and Indigenous and Equity aspirations were not met.

Indigenous Consultation summary		
Consultation with Indigenous people	None listed.	Not done.
Consultation with Indigenous Elders	None listed.	Not done.
Consultation with Indigenous communities	None listed.	Not done.
Consultation with Indigenous Land Councils	None listed.	Not done.
Consultation with Indigenous Corporations	None listed.	Not done.
Consultation with Indigenous organisations	None listed.	Not done.
Consultation with Indigenous representative groups	None listed.	Not done.

RTD02 Conservation and Land Management Training Package Project Steering Committee

Membership Project Steering Committee	Organisation and representative group	Indigenous person or Representative
Ralph Leutton (chair)	Cotton Australia Industry peak body	No.
Anne Wiltshire	North Melbourne Institute National training providers network and Public provider – VIC	No.
Cameron Archer	Tocal Agricultural College Private provider - NSW	No.
Carolyn McGregor	Department of Environment and Conservation Industry/government agency	No.
David Greentree	NSW Department of Natural Resources (previously Dept of Infrastructure, Planning and Natural Resources) Industry/government agency	No.
Dean Holland	Greening Australia Industry organization and training provider	No.
Don Hayes	Australian Workers Union Union	No.
Geoff Bloom	Rural Skills Australia Industry peak body	No.
Niels Jacobsen	Rural Training Council of Australia ITAB	No.
Rod Thirkell-Johnson	Tasmanian Farmers and Graziers Industry	No.
Paul Keegan	DEST Commonwealth Government	No.
Amanda Howden	NT Department of Employment, Education and Training Government (State Training Authorities)	No.

RTE03 Project steering committee

Membership Project Steering Committee	Organisation	Indigenous or Equity Representative
ROB JACOBS Chair	Primary Industry Skills Council SA	No.
WAYNE CORNISH	Education and Training National Farmers Federation	No.
BRENDA MCLACHLAN	Program Manager – Education Initiatives Dairy Australia	No.
BARRIE BAKER	Director South West TAFE	No.
GORDON GRIFFIN	Education and Training Advisor, (Vic, Tas) Rural Skills Australia	No.
KRIS NEWTON	CEO Horticulture Australia Council	No.
NICKIE BERRISFORD	Executive Officer Grains Industry Training Network	No.
DAVID HARDY / KATHI ELAND	Industry Skills Development Group, DEST	No.
JULIUS PFULL	Compliance Officer / Auditor Depart. of Education & Training NSW	No.
LORNA CITER	Manager - Johne's Disease And Training Services Animal Health Australia	No.
DON CLIFFORD HAYES	Branch President The Australian Worker's Union	No.
SYLVIA VAGG	Program Manager Warragul Campus National Centre for Dairy Education Australia	No.
PAUL COMYN	Program Manager Education & Adoption Australian Wool Innovation	No.
MALCOLM MCKAY	College Director Australian Agricultural College	No.
JENNY WARDROP	Project Manager Agri-Food Industry Skills Council	No.

AHC10 Rural and related standing committee March 2010

Membership Project Steering Committee	Organisation	Indigenous or Equity Representative
Chairman Duncan Fraser	National Farmers Federation	No.
Michael Connor	Australian Dairy Federation	No.
James Dennis	Primary Skills Victoria/ National Farmers Federation	No.
Ursula Alexander-Smith	Vet Nurses Council Australia	No.
Karen Brock	Nursey & Gardening Industry Australia	No.
Yvonne Bowling	National Farmers Federation	No.
Chris Thiesfield	Training Recognition Board of Queensland	No.
Wendy Allen	National Farmers Federation (AgForce)	No.
Mike Clark	Greening Australia	No.
Ken Houghton	NT Primary Industry Training Advisory Council	No.
Trevor Ranford	Horticulture Australia Council	No.
Trevor de Landgrafft	WA Farmers Federation (Broadacre)	No.
Geoff Bloom	Rural Skills Australia	No.
Di Dibley	Greening Australia (Policy & Development)	No.

AgriFood and Skill Sets

Agrifood's own research projects funded through WELL programs quote "respondents saw the benefits of skill-set training options that related to community or individual needs, such as combinations of units from different training packages (i.e. horticulture and business) to support indigenous plant nurseries or clusters, such as OHS, chainsaw usage and environment management systems units to support such occupations as a firewood cutting business"

Specifically, respondents to this research reported demand for the following skill sets:

- OHS, teamwork and communication – 'a basic starter in any workplace'
- calving, ChemCert and pasture management training – 'all needed in farm work'
- chainsaw training and stop/go sign training – "good practical employment 'tickets'
- identifying weeds and back hoe training – 'good skill in regeneration areas'
- WorkCover – specialist cards – 'rural and remote work tickets'
- OHS, quality issues and food handling – 'a food handling skills passport at level I'
- HACCP, OHS and food handling – 'a perfect combo for a skills set' – 'working in the food industry'
- tourism, mining, small business, caring for country – 'any group of skills that can be used in other industries where there is funding'

Discussion paper for consultation Language, Literacy and Numeracy Program Services, Department of Education, Employment and Workplace Relations, Response from the Agri-Food Industry Skills Council, July 2008

Question: Were any Skill Sets from this research developed or used in AgriFood Training Packages?

Skill Sets from AgriFood Research	AgriFood value comment	Availability of these Skill Sets in AgriFood Training Packages

		RTD02	RTE03	RTFO3	AHC10	FDF10
OHS, teamwork and communication	'a basic starter in any workplace'	No.	No.	No.	No.	-
calving, ChemCert and pasture management training	'all needed in farm work'	No.	No.	No.	No.	-
chainsaw training and stop/go sign training	'good practical employment 'tickets'	No.	No.	No.	No.	-
identifying weeds and back hoe training	'good skill in regeneration areas'	No.	No.	No.	No.	-
WorkCover –specialist cards	'rural and remote work tickets'	No.	No.	No.	No.	-
OHS, quality issues and food handling	'a food handling skills passport at level I'	-	-	-	-	No.
HACCP, OHS and food handling	'a perfect combo for a skills set' – 'working in the food industry'	-	-	-	-	No.
tourism, mining, small business, caring for country	'any group of skills that can be used in other industries where there is funding'	No.	No.	No.	No.	-

Anindilyakwa land and sea rangers - Case Study training program Skill Set	**Skill Set developed yes/no**	**Skill Set incorporated into AHC10**
The AgriFood **Get Real Factor** documented the delivery of the following culturally relevant skills cluster: **Weed Management**	Identified only in Case Study.	Not done.
RTC2401A Treat weeds RTC2706A Apply chemicals under supervision RTC3401A Control weeds SFIEMS201A Participate in environmentally sustainable work practices[1]	Not developed.	Not incorporated into any Training Package

[1] The unit SFIEMS201A Participate in environmentally sustainable work practices has not been imported into the AHC10 Training Package.

DEWHA Indigenous Ranger program 2008 - 2009 **Skills Set focussing on Weed Control and Management** INDIGENOUS RANGER Skills Guide	**Skill Set developed yes/no**	**Skill Set incorporated into AHC10**
RTC2016A Recognise plants RTC2005A Fell small trees RTC1301A Operate basic machinery and equipment RTC2304A Operate and maintain chainsaws FPICOT2234A Operate 4X4 vehicle RTD2313A Clean machinery of plant, animal and soil material RTC1701A Follow basic chemical safety rules RTC2706A Apply chemicals under supervision RTC2401A Treat weeds	Not developed.	Not incorporated into any Training Package including AHC10.

DEWHA Indigenous Ranger program 2008 - 2009 **INDIGENOUS RANGER Skills Guide**	Training package product developed	Training package product incorporated into AHC10.
85 existing units of competency were identified for the Indigenous Ranger Skills Matrix.	No new product, qualification or Skill Set was developed.	No new Indigenous qualification or Skill Set incorporated into AHC10.
The Indigenous Ranger Skills Matrix was developed within the same time frame as the AHC10 Training Package.	No new AHC10 Indigenous units of competency were developed.	No new Indigenous skills were identified and developed for the AHC10 Training package.
The INDIGENOUS RANGER Skills Guide lists several imported units identified in the Indigenous Ranger Skills Matrix to be used by Project Coordinators, Facilitators and Departmental staff training in the implementation of Indigenous Ranger training.	Not imported.	Not incorporated into AHC10.

Summary

The proposed merger of the three AgriFood training packages is the avoidance mechanism for implementing the three Phase 2 review recommendations. Stakeholder feedback from these reviews has been, in practical terms, largely ignored and implementation of feedback has not been done, or has been poorly or partially done or is incomplete. The AHC10 review phase is a very poor substitute for the intensive and comprehensive reviews of the three existing training packages.

The proposed AHC10 training package does not incorporate stakeholder feedback and does not represent current stakeholder need and does not have key stakeholder endorsement. It remains very doubtful that the AHC10 training Package is fit for endorsement.

Recommendations:

- That the AHC10 Training Package <u>not</u> be endorsed by the National Quality Council (NQC).
- The NQC independently review the design, consultation and development processes of the AHC10 Training Package.
- That AgriFood Skills Australia be held accountable to meet the standards of the national Quality system.
- That the AHC10 Training Package be re-developed to meet the national Training Package Development Handbook guidelines.
- That an independent review be undertaken to gauge stakeholder engagement and satisfaction following assurance of incorporation of stakeholder feedback.
- That an independent audit be undertaken to ensure identification and consultation of key stakeholders in accordance with national best practices for ISCs.
- That AgriFood Skills Australia fulfil their roles and responsibilities in the NQC-agreed processes as outlined in the *Training Package Development and Endorsement Process* and supporting documents.
- that the AHC10 Training Package be re-submitted for endorsement following successful review and audit outcomes and following formal key stakeholder endorsement.

Appendix:

Preliminary notes on the AHC10 units of competency and qualifications

Appendix: Preliminary notes on the AHC10 units of competency and qualifications

These notes derive from a cluster view of specific symptoms across a number of units, rather than a single unit analysis, within the initial sections and review individual units and qualifications for a specific issue or to provide a specific comment in the later sections. These notes are not a comprehensive review of the entire Training Package and refer to the initial documentation uploaded for final validation on 17 February 2010. Revised documentation has been uploaded after that date.

Selected AHC10 units of competency exhibit symptoms of four broad issues that are discussed below:

- Indeterminacy and vague generalisations
- Lack of precision of assessment focus
- Multiple activity units / Aggregation of competency standards
- Content–free units with severe skills deficiencies

Other units contain a range of other issues that are discussed in a later section:

- Employability Skills Summary
- Employability Skills – A Case Study
- DUPLICATION OF UNITS OF COMPETENCY
- DUPLICATION OF QUALIFICATIONS
- Errors, Omissions, Discrepancies, Inconsistencies et al
- UNIT Mapping Document / UNIT REGISTER

1 Indeterminacy and vague generalisations

The AHC10 training package contains a plague of indeterminate commentary throughout the proposed units of competency. The following statements are samples of confusing, vague and relatively useless generalised statements littered throughout the performance criteria in most of the units of competency.

- using enterprise procedures / enterprise work procedures../ according to enterprise policy and procedures / in accordance with enterprise policy and procedures
- according to manufacturers guidelines / according to manufacturers specifications / in accordance with manufacturer's recommendations.
- according to manufacturers specifications and enterprise work procedures.
- in accordance with manufacturer's specifications, organisational procedures and regulations.
- according to manufacturer's guidelines and industry standards.
- in accordance with manufacturer's and enterprise procedures.
- in accordance with regulatory requirements and enterprise procedures.
- in accordance with statutory requirements and enterprise standards.
- in accordance with enterprise standards.
- according to enterprise quality standard.
- with enterprise quality procedures
- to industry performance standards.
- to the standard required.
- are determined by ...... accepted industry practice.
- according to organisational requirements.
- according to work site guidelines.
- according to workplace information.
- to meet system specifications according to technical manuals.
- according to system specifications, technical manuals and OHS requirements.

Many performance criteria lack precision of expression. One aspect of the use of these generalisations is inconsistency. Another aspect is indeterminacy and confusion. A third aspect is unnecessary repetition within the unit and across units.

Example: AHCIRG304A   Operate gravity fed irrigation systems
3.2   System components are shut down in sequence in accordance with manufacturer's and enterprise procedures.
3.3   Drainage and treatment systems are checked in accordance with enterprise procedures.
3.4   Tailwater control systems are implemented in accordance with statutory requirements and enterprise standards.
3.5   Irrigation activities are reported and recorded in accordance with regulatory requirements and enterprise procedures.

Example: AHCVPT306A Apply animal trapping techniques

The Application of the unit contains:
        This unit applies to working within established routines, methods and procedures,

and the Performance Criteria contain all the following references:
        from the management strategy and action plans.
        in accordance with OHS practices and procedures.
        in accordance with statutory and local authority requirements
        in accordance with the management strategy and relevant monitoring programs
        in accordance with OHS practices and procedures.
        in accordance with manufacturer's specifications and relevant policies.
        in accordance with industry practice.
        in accordance with industry practice.
        in accordance with manufacturer's instructions.
        in accordance with industry practice.
        in accordance with manufacturer's instructions
        in accordance with industry practice.
        in accordance with industry practice.
        in accordance with industry practice.
        according to enterprise requirements and animal welfare guidelines.
        according to supervisor instructions and enterprise guidelines.
        according to legislative and enterprise requirements.
        in accordance with industry practice.
        according to enterprise guidelines.
        according to legislative, enterprise, occupational health and safety and public safety requirements.
        in accordance with relevant policies and procedures and industry practice.
        in accordance with relevant standards and policies.
        accordance with statutory requirements and enterprise guidelines.

A suggested treatment is provided in Table 1 in which the variations of generic references have been removed and replaced with relevant statements in the application of the unit. The assessable content of the performance criteria is highlighted and each performance criterion has clarity of outcome while simplifying the content for understanding and maintaining the integrity of the unit.

Table 1.

Existing unit AHCVPT306A Apply animal trapping techniques	Suggested treatment AHCVPT306A Apply animal trapping techniques
Application of the unit	**Application of the unit** [Typo: Insert description of the unit application]
This unit applies to working within established routines, methods and procedures.	This unit applies to working within established routines, work instructions, methods and procedures that are in accordance with industry practice and with OHS practices and procedures. Equipment is used and calibrated in accordance with the manufacturer's specifications. Animals are handled in accordance with animal welfare guidelines. Work practices are in accordance with legislation and local authority regulations.
ELEMENT PERFORMANCE CRITERIA	**ELEMENT PERFORMANCE CRITERIA**
1. Plan animal capture	**1. Plan animal capture**

1.1. Purpose of capture of animals is identified as determined from the management strategy and action plans. 1.2. Target animal range and behaviour are confirmed. 1.3. Trapping location and placement of equipment are determined. 1.4. Time required to complete capture is estimated and trapping effort is determined. 1.5. Materials and equipment for trapping are identified. 1.6. Hazards associated with trapping are identified in accordance with OHS practices and procedures. 1.7. Environmental risks associated with capturing animals are identified in accordance with statutory and local authority requirements.	1.1. Purpose of **capture** of animals is identified. 1.2. **Target animal** range and **behaviour** are confirmed. 1.3. Trapping location and placement of equipment are determined and are mapped to be consistent with target animal behaviour. 1.4. Time required to complete capture is estimated and trapping effort is determined. 1.5. Materials and equipment for trapping are identified. 1.6. **Hazards** and environmental threats associated with trapping are identified, risks assessed and controls implemented. 1.7. Relevant **licenses** and **permission** to enter property are obtained. 1.8. Vehicles, equipment and materials are checked for **serviceability**.
2. Prepare for trapping 2.1. Locations for the trapping activity are mapped to be consistent with target animal behaviour and in accordance with the management strategy and relevant monitoring programs. 2.2. Relevant licenses and permission to enter property are obtained. 2.3. Precautions to minimise hazards are identified in accordance with OHS practices and procedures. 2.4. Precautions to minimise environmental risks associated with capturing the target animal are identified. 2.5. Precautions to minimise trapping of non-target animals are considered. 2.6. Vehicles, equipment and materials are checked for serviceability in accordance with manufacturer's specifications and relevant policies.	[Merged with E1]
3. Place and set traps 3.1. Site for trapping is selected to maximise chance of trapping target animals and minimise chance of trapping non-target animals. 3.2. Site for capturing animals is prepared in accordance with industry practice. applied in accordance with industry practice. 3.3. Trapping equipment is constructed, positioned and secured in accordance with industry practice. 3.4. Trapping equipment is set safely in accordance with manufacturer's instructions. 3.5. Trapping equipment is checked for strength and security in accordance with industry practice. 3.6. Trap mechanisms are set or calibrated in accordance with manufacturer's instructions. 3.7. Lures or baits are applied in accordance with industry practice if required. 3.8. Traps are camouflaged as required. 3.9. Precautions to prevent trapping of non-target animals are applied in accordance with industry practice.	**2. Place and set traps** 2.1. Site for trapping is selected and prepared to maximise chance of trapping target animals and minimise chance of trapping non-target animals. 2.2. **Trapping equipment** is constructed, positioned and secured and set safely. 2.3. Trapping equipment is checked for strength and security. 2.4. Trap mechanisms are set or calibrated. 2.5. **Lures or baits** are applied if required. 2.6. Traps are **camouflaged** as required. 2.7 Precautions to prevent trapping of non-target animals are applied.
4. Check and remove traps 4.1. Traps are checked regularly in accordance with industry practice. 4.2. Trapped animals are identified then released, killed or prepared for transport in accordance with industry practice. 4.3. Captured animals are handled humanely according to enterprise requirements and animal welfare guidelines. 4.4. Animals are checked according to supervisor instructions and enterprise guidelines. 4.5. Animals are transported from site where required in a safe and appropriate manner according to legislative and enterprise requirements. 4.6. Occupational health and safety and public safety requirements are met prior to and during trapping activities. 4.7. Trap mechanism is released safely and trap is removed in accordance with industry practice.	**3. Check and remove traps** 3.1. Traps are checked regularly. 3.2. Trapped animals are identified then released, killed or prepared for transport. 3.3. Captured animals are **handled** humanely. 3.4. **Trap mechanism** is released safely and trap is removed. 3.5. Trap site is restored to prior condition.

4.8. Trap site is restored to prior condition.	
5. Report completion of work 5.1. Results of trapping activities are reported according to enterprise guidelines. 5.2. Incidents with animals are dealt with and reported according to legislative, enterprise, occupational health and safety and public safety requirements.	**4. Report completion of work** 4.1. Results of trapping activities are reported. 4.2. Incidents with animals are dealt with and reported 4.3 **Carcasses** for research or other purposes are cleaned and stored 4.4 Target and non-target **kills** are recorded
6. Clean and store equipment and material 6.1. Carcasses for research or other purposes are cleaned and stored in accordance with relevant policies and procedures and industry practice. 6.2. Equipment and materials are cleaned and stored in accordance with relevant standards and policies. 6.3. Target and non-target kills are recorded in accordance with statutory requirements and enterprise guidelines.	[Merged with E4]
RANGE STATEMENT	**RANGE STATEMENT**
Provide the addition of a comprehensive Range statement linking to the PCs	Provide the addition of a comprehensive Range statement linking to the PCs. Range inclusions may include: **Capture** **Target animal** **Behaviour** **Hazards** **Licenses** **Permission** **Serviceability** **Trapping equipment** **Lures or baits** **Camouflaged** **Handled** **Trap mechanism** **Carcasses** **Kills**

This treatment option deletes the generalised references and keeps only the evaluative commentary that is relevant to the work outcomes directly related to that particular unit of competency and renders the unit content accessible for all levels of audience. The addition of an adequate range allows for all the detail of occupational nuance and technical information to be available to the reader, learner and trainer/assessor. The presence of indeterminate references, in the context of reviewing the documentation, masks the subtle deficiencies of the content of the units

An existing example of this treatment is in the unit **AHCPHT201A Plant horticultural crops.**
The clarity of the PCs reflects the precision of the language that is also appropriate to AQF alignment.
The application of suitable range commentary to explain the terminology would however produce a greater understanding of the objects, processes and technical references. This treatment has been applied to a number of the AHC10 units but has not been consistently applied across the Training Package.

Another treatment option is to define and use with consistency an agreed set of requirements across all the relevant units within the training package perhaps with refinement to each of the AQF alignment levels.
> The unit applies to working within established routines, work instructions, methods and procedures that are in accordance with industry practice and with OHS practices and procedures.
> Equipment is used and calibrated in accordance with the manufacturer's specifications.
> Machinery, equipment and tools are operated according to low risk operating procedures.
> Work practices are in accordance with legislation and local authority regulations.
> Animals are handled in accordance with animal welfare guidelines.

Another option is to define the industry standards by specific reference to the Industry guidelines, Australian Standards and technical Codes of Practice published by the relevant national association or Authority in each industry sector where appropriate for that particular unit of competency.

There are numerous instances of Industry guidelines, Industry Quality Assurance programs, Australian Standards and technical Codes of Practice published for specific industry sectors that are not adequately referenced in the relevant units as knowledge requirements, or in the Application of the unit, nor referred to as a context in the Range statement.

One example where this has been done: **AHCARB303A Implement a tree pruning program**
> 2.2. Pruning cuts are implemented according to established pruning techniques and AS4373 Pruning of Amenity Trees as required.

Examples of published Industry documentation:
Urban Irrigation Best Management Practice Guidelines
Australian Pig Industry Quality Program (APIQ)
Nursery Industry Water Management Best Practice Guidelines
Nursery & Garden Industry Biosecurity Plan
The Emergency Plant Pest Response Deed (EPPRD)
Cattlecare
Flockcare
Freshcare
Graincare
Proven Perfect
NIASA Best Practice Management Guidelines
Code of Practice for the Preparation of Australian Wool Clips
Australian Explosives Code (issued by Commonwealth Dept. of Transport and Regional Services)
AS4373-2007 Pruning of amenity trees
AS4970-2009 Protection of Trees
AS4454-2003 Composts, soil conditioners and mulches
AS 4419-2003: Soils for. Landscaping and. Garden Use
ISO 19011:2003: Guidelines for Quality and/or Environmental Management Systems Auditing

Legislation

With respect to legislation and regulations, there appears to be no determination of the precise or comparative relevance of statutory requirements (legislation), regulatory requirements (local government and local authorities) to each specific performance criterion, the Application of the unit, the relevant knowledge requirement or implications as a range context.

Where a specific piece of legislation or regulation refers to an individual performance criterion then it requires inclusion into that performance criterion, otherwise reference can be made for the unit as a whole as a knowledge requirement, or in the Application of the unit, or referred to as a context in the Range statement, and the specific legislation or regulation should be stated by title and year of enactment where known.

Range inclusions required are the relevant legislations, regulations and policies covering Federal Acts, State Acts and local Government and local Authority regulations.

A legislation specific unit such as **AHCWRK508A Interpret legislation** require a contextualisation of the Range statement for specific industry applications. Comprehensive statements may be required for specific job roles such as consultancy based occupations like Landscape Designers where the interpretation of multiple interrelated documents comprises the specific work outcome required in the workplace:

State based legislation covers but is not limited to relevant Acts, regulations and policies in state and local jurisdictions, for example, such as in NSW:
- Heritage Act(NSW)
- Environmental Planning and Assessment Act (NSW) 1979
- Native Vegetation Act (NSW) 2003
- Threatened Species Conservation Act (NSW) 1995
- Nature Conservation Trust Act (NSW) 2001
- Noxious Weeds Act (NSW) 1993
- Dividing Fences Act
- Civil Liability Act 2002 (NSW)
- Rural Fires Act
- Protection of the Environment Operations Act
- Civil procedures Act 2005 (NSW)

- Inclosed Lands Act 1901
- Tree Preservation Orders
- Development Control Plan(s)
- Local Environment Plan(s)
- Landscape Policy
- State Environmental Planning Policies (SEPP)
- Regional Environment Plans (REP)
- Contract law

Good use of legislation and Australian Standards can be found in the Range of the unit: **AHCEXP301A Handle and store explosives**

Security procedures and systems may include:
- the provisions of AS Explosives Code Storage and Transport; Australian Code for the transport of explosives by Road and Rail (ATE Code); and/or other State or Territory legislation.

The Australian Standards relevant to this standard include
- AS2187.1 - 1998, Part 1: Storage and land transport
- AS2187.2 - 1993, Explosives - Storage, transport and use.
- AS2187.0 - 1998, Explosives Glossary of terms.
- AS1216 1995, Class labels for dangerous goods,
- and/or in any the relevant State and Territory legislation.

Other examples of indeterminate commentary used throughout AHC10:

- action is undertaken where necessary to achieve program objectives
- in an environmentally responsible way.
- of in an environmentally aware and safe manner
- in an environmentally appropriate manner
- and with due consideration of the environmental implications.
- in full consideration of OHS and environmental implications
- in an appropriate and safe manner according to supervisor's instructions.
- in consultation with the supervisor.
- in a sequential, timely and effective manner
- The environmental implications of site preparation are identified, likely outcomes assessed and, if necessary, responsible action is taken.

OHS variations include:
- OHS requirements are identified, associated hazards and risks assessed, and suitable controls implemented.
- OHS hazards are identified, risks assessed and reported to the supervisor
- OHS legislation and industry and enterprise safety standards
- according to OHS legislation and codes of practice requirements.
- to conform to manufacturer's recommendations and OHS guidelines.

2   Lack of precision of assessment focus

Many performance criteria lack precision of focus on defining the relevant standard for performance. The responsibility for providing an assessment focus within the performance criteria has been abrogated to external documentation of an unknown or unspecified nature.

References a pre-existing third party document, program or plan which is presumed to exist but the existence of which cannot be determined, and which is however, used as the referenced standard.

This unverified document is then frequently referred to throughout the PCs of particular units as the source document for work activity description and performance measurement.

The 'plan' is a 'whole farm plan', 'work plan' 'maintenance program', 'production plan' or similar unknown operations manual, operational plan, business plan or production plan. It is unclear whether this is a 'an individual farmer's plan for a paddock or an enterprise 'work plan' for a process. It is clear that these unknown documents have questionable merit in the description of the performance criteria of the units of competency

AHCIRG301A Implement a maintenance program for an irrigation system
This unit contains constant self references to an unknown document labelled the 'irrigation maintenance program'. The PCs describe the work outcomes but also determine this document as the standard to be met.
It is possible that this unit could be collapsed to a single Element titled Implement the 'irrigation maintenance program' and a single PC titled Perform the 'irrigation maintenance program' if the referenced document was an endorsed national industry standard..

Samples of units exhibiting this symptom:
AHCLSK311A Implement feeding plans for livestock – 'feeding plan'
AHCBAC308A Undertake agricultural crop harvesting activities – "harvest strategy" and 'crop storage plan'.
AHCBAC201A Assist agricultural crop establishment – "crop production plan" and 'planting plan'
AHCMOM204A Undertake operational maintenance of machinery – 'maintenance plan'
AHCBAC306A Establish agricultural crops– 'work plan'
AHCBAC305A Undertake preparation of land for agricultural crop production – "cultivation plan" and 'planting plan'
AHCVPT306A Apply animal trapping techniques – 'management strategy and action plans' and 'monitoring programs'

3   Multiple activity units / Aggregation of competency standards

Numerous units show a collection of activities adequately covered by existing units of competency and presented as a single unit of competency purporting to describe a precise agricultural operation.

For example,   **AHCBAC306A Establish agricultural crops** contains:

- Machinery and equipment: selection; confirmation, preparation, calibration, maintenance, damage, malfunction, performance, cleaning, security, records, manufacturer's specifications, reporting and storage,
- OHS and PPE requirements,
- Contingency plan preparation,
- Weather monitoring,
- Fertiliser application,
- Pest and disease control coordination,
- Recognition and confirmation of soil conservation and sustainable land management practices and procedures and
- Environmental implications

The precise work outcome 'Sowing seed' is buried in a single PC and whose performance criteria remain undescribed and referenced solely in an unknown document 'the work plan'.
1.   Seeding and fertiliser applications are carried out in line with the work plan.

The precise performance criteria required for sowing seed for crop establishment are completely absent and the performance criteria for this work outcome remain undescribed.

Other notes:
References to tillage (cultivation) in the Critical Aspects for Assessment are not consistent with the Performance Criteria. Similarly there are no references to seed placement and application rates, weed identification, machine operation, obtaining relevant licences

Further examples:

AHCBAC302A Establish pastures and crops for livestock production
AHCNAR201A Carry out natural area restoration works
AHCBAC202A Assist agricultural crop maintenance
AHCILM302A Provide appropriate information on cultural knowledge
AHCNSY302A Receive and dispatch nursery products
AHCNSY304A Deliver and promote sales of plants - new
AHCAGB504A Plan production for the whole land/farm based business
AHCBUS605A Manage human resources
AHCWRK602A Lead and manage community or industry organisations

4 Content–free units with severe skills deficiencies

Note; numerous units in AHC10 are content–free or exhibit severe skills deficiencies.
The units contain a lot of evaluative comment on set up procedures and often the entire Element 1 PCs rehash general requirements for identification or preparation that are applicable to nearly every unit.
The last element is often a vague and generalised statement about cleaning up the worksite on completion of work. This is not a component of the competency - it is a separate component related to the industry quality of work requirements or the employer expectations about the worksite that is equally applicable to large numbers of units.

The assessable focus of the unit is cocooned with ancillary and unnecessary elements and the unit lacks the precision and clarity of a well defined and assessable set of performance criteria.

AHCBAC305A Undertake preparation of land for agricultural crop production
This unit contains little evaluative reference to the process of preparing land.
There is no description of the actual processes of cultivation.
- E1 is a generic 'Prepare for' reference.
- E2 is a generic "Prepare equipment' element and contains only references to vehicle selection and operational maintenance which are adequately covered in other units.
- E3 is the core element for actual cultivation but only contains debris removal, OHS and PPE requirements, safe vehicle operation, quality checking, meeting scheduling requirements and one generalised comment about following and completing a 'cultivation plan'.
- E4 is a generic 'Prepare site' element.
- E5 is a generic 'Clean up' element.

There are frequent references to an unknown 'cultivation plan' and an unknown 'planting plan' and an unknown 'production plan'.
*	Re-write this unit as "Prepare soils" or "Cultivate soils" or re-title "Implement a cultivation and planting plan"

Further examples:
AHCPHT305A Regulate crops
AHCBAC306A Establish agricultural crops
AHCBAC203A Assist agricultural crop harvesting
AHCBAC201A Assist agricultural crop establishment
AHCBAC202A Assist agricultural crop maintenance
AHCVPT302A Implement vertebrate pest control program

AHCLSK404A Implement and monitor animal welfare programs
This unit contains five repeated Elements on implementation of procedures and the reporting of issues.

AHCILM303A   Work in an indigenous community or organisation
This unit has an unashamed historical research focus and displays a complete deficiency of work outcomes linked to a job role.

AHCILM301A Propose appropriate uses of traditional customs
quote:
> There is a real need to rewrite AHCILM301A Proposed appropriate uses of traditional customs.
> It is not clear from reading the performance criteria what is supposed to be taught in this unit. The performance criteria is not clear, some statements don't actually make sense, and it is very difficult to understand the learning outcome intended.
> I would like to see the focus of native title removed, and replaced with a more general reference to legal mainstream/indigenous land management frameworks that could include ILUA's, Indigenous Protected Area's, Indigenous Local Government organisations or native title. Also I believe the Specific Knowledge required for this unit is too onerus for Cert III – relevant state land and resources acts/legislation for this area is very extensive.
> This unit needs to be rewritten from scratch with a sound understanding of the intended learning outcome. I am looking foward to seeing the additional guidance information for this unit.

5. Employability Skills Summary

The AHC10 Employability Skills have not undergone a thorough treatment and appear to be a result of multiple cut and paste operations across all of the qualifications. All AHC10 Employability Skills are wholly generic and not specific to the work outcomes required by industry and have not been endorsed by industry. There has been little or no job specific Employability Skills created for the AHC10 qualifications or units of competency. There have been no contextualized facets of Employability Skills developed for the AHC10 qualifications. Employability Skills have not been explicit and embedded within units of competency.

6. Employability Skills – A Case Study – with apologies to all Beekeepers everywhere

BeeKeepers

Beekeepers have Communication skills - "Sharing information" but not "Speaking clearly and directly" and not "Working with diverse individuals and groups"….

So beekeepers love "Sharing information" but without the ability to "Speak clearly and directly "....
so they interact a lot but no-one can understand them...perhaps the face masks need to come off first...
and they don't "Share information" while "Working with diverse individuals and groups",
so they spend their time muttering amongst themselves in little huddles around beehives......

but they are good at "Establishing clear project goals and deliverables", while isolated from the community as local pariahs speaking in tongues as a close knit group, they would get very focused on the importance of bee work...

Their only learning skill is "Accessing opportunities to develop technical and other work skills";
Hmmmm...

These are just about the most extraordinary and resourceful people imaginable -
hopelessly inarticulate, and fairly xenophobic, but able to access state of the art technical information
without actually doing any learning and keep the information locked up in their tight society and secret language....

Can you imagine the difficulty of preparing a learning and assessment strategy for this target group?

I propose the unpacking of this qualification be submitted to the VET Olympics as an endurance event

NB
This qualification is a work of fiction and any resemblance to an actual Beekeeper is purely coincidental.
No Beekeepers were harmed or damaged in any way during the construction of this qualification.
A serious attempt at analysis of the Employability skills cannot be attempted due to reasons mentioned above.

7.   DUPLICATION OF UNITS OF COMPETENCY

Reference: AHC31610 Certificate III in Lands, Parks and Wildlife
What is the difference between?
AHCLPW302A Assist in the implementation of legislation
AHCPMG306A Ensure compliance with pest legislation
Neither unit is contained in the Level 3 Unit Group published on the web site nor can this qualification be validated while the units are not described.
AHCWRK404A Implement the compliance of legislation

Also missing from the Level 3 unit group is AHCPMG305A Identify and report unusual disease or plant pest signs

Reference: AHC30110 Certificate III in Agriculture
AHCMOM303A Operate machinery and equipment
AHCMOM304A Operate specialised machinery and equipment
AHCPHT304A   Harvest horticultural crops mechanically
AHCBAC308A Undertake agricultural crop harvesting activities
AHCMOM309A Operate broadacre sowing machinery and equipment - New
AHCMOM310A Operate land-forming machinery and equipment- New
AHCMOM311A Operate precision control technology- New
AHCMOM307A Operate broad acre and row crop harvest machinery and equipment - New
AHCMOM312A Operate row crop planting and seeding machinery and equipment- New
AHCMOM313A Operate mobile irrigation machinery and equipment- New
AHCPHT302A   Coordinate horticultural crop harvesting

Reference: AHC30610 Certificate III in Production Horticulture
AHCPHT301A Carry out a crop regulation program
AHCPHT305A Regulate crops

Reference: AHC30110 Certificate III in Agriculture
Why is there a need to differentiate between these types of crops?
The competency is crop establishment and the differences are Range variables.
AHCBAC306A Establish agricultural crops
AHCPHT306A Establish horticultural crops

Reference: AHC32410 Certificate III in Irrigation
There is overlap of process of startup checks, inspections, malfunction repair, system performance and shutdown process.
There are a number of areas to rationalise these units.
AHCIRG305A   Operate pressurised irrigation systems
AHCIRG304A   Operate gravity fed irrigation systems
AHCIRG301A   Implement a maintenance program for an irrigation system
AHCIRG303A   Measure irrigation delivery system performance

AHC30710 Certificate III in Horticulture
AHCWRK309A Maintain and monitor environmental work practices
AHCWRK313A Implement and monitor environmentally sustainable work practices

AHC40110 Certificate IV in Agriculture
AHCSHG407A Oversee and instruct shed staff
AHCWOL404A Establish shearing routines and manage shearing shed staff
AHCWRK403A Supervise work routines and staff performance

AHC40210 Certificate IV in Poultry Production
This unit does not exist.
AHCBIO302A Implement and monitor quarantine and biosecurity measures
and it also has the same coding as
AHCBIO302A Identify and report unusual disease or plant pest signs

AHC50110 Diploma of Agriculture
AHCAGB503A Plan and monitor production processes
AHCAGB504A Plan production for the whole land/farm based business

AHC51310 Diploma of Pest Management
AHCPMG501A Coordinate the pest management strategy in a regional or broader context
AHCPMG502A Define the pest problem in a regional or broader context
AHCPMG503A Develop a strategy for the management of target pests
AHCPMG504A Develop a system for monitoring the pest management strategy
AHCPMG505A Evaluate the pest management strategy
AHCPMG506A Manage the implementation of legislation
AHCPMG601A Develop a plant pest survey strategy
AHCPMG602A Develop a plant pest destruction strategy
These units have multiple levels of complex overlap and duplication and require a separate review process.
The qualification requires review as a result of the unit analysis.

In addition to above these are other areas of overlap in the Pest Management, Biosecurity and NAR units:
AHCNAR502A Conduct biological surveys
AHCPMG601A Develop a plant pest survey strategy
AHCBIO501A Manage active operational emergency disease or plant pest sites
AHCBIO502A Manage the implementation of an emergency disease or plant pest control program
AHCBIO601A Plan and oversee an emergency disease or plant pest control program

In addition to above these are typo duplicates listed in Unit Register
AHCBIO602A Develop a plant pest survey strategy
AHCPMG601A Develop a plant pest survey strategy
AHCBIO603A Develop a plant pest destruction strategy
AHCPMG602A Develop a plant pest destruction strategy

There is a similar degree of overlap in the Certificate 4 Pest Management units:
AHCPMG401A Define the pest problem in a local area
AHCPMG402A Develop a pest management action plan within a local area
AHCPMG403A Develop monitoring procedures for the local pest management strategy
AHCPMG404A Coordinate the local pest management strategy
AHCPMG405A Implement pest management action plans
AHCPMG406A Investigate a reported pest treatment failure
AHCPMG407A Monitor and evaluate the local pest management action plan
AHCPMG408A Control weeds, pests and or diseases

For example, this unit has AQF 4 outcomes: AHCPMG504A Develop a system for monitoring the pest management strategy
which develops procedures for monitoring the impacts of pests and documenting a schedule; and can be combined with
AHCPMG403A Develop monitoring procedures for the local pest management strategy, which determines the data required
for monitoring the impact of pests and also documents a schedule.
The combined unit can be merged with AHCPMG407A Monitor and evaluate the local pest management action plan, which
also monitors the impact of pests and provides a report on the program outcomes.

There is further overlap and duplication with the Biosecurity units
AHCBIO401A Supervise activities on infected premises
AHCBIO402A Carry out field surveillance for a specific emergency disease or plant pest
AHCBIO403A Plan and implement a biosecurity program

AHC50110 Diploma of Agriculture
The outcomes of these units are identical/have massive overlap.
AHCMOM501A Manage machinery and equipment
AHCMOM502A Implement a machinery management system
This unit has a closer alignment to AQF4 outcomes: AHCMOM501A Manage machinery and equipment

AHC51710 Diploma of Rural Machinery Management
The outcomes of these units are identical/have massive overlap.
AHCOHS501A Manage OHS processes
BSBOHS504B Apply principles of OHS risk management
BSBOHS506B Monitor and facilitate the management of hazards associated with plant

AHC51710 Diploma of Rural Machinery Management
The outcomes of these units are identical/have massive overlap.
AHCMOM501A Manage machinery and equipment
AHCMOM502A Implement a machinery management system
AHCMOM601A Analyse machinery options

AHC51710 Diploma of Rural Machinery Management
TLIR307C Negotiate a contract
AHCBUS503A Negotiate and monitor contracts

AHC51510 Diploma of Chemical Application Technology
These are duplicated units within the one qualification
AHCCHM401A Minimise risk in the use of chemicals
AHCCHM501A Develop and manage a chemical use strategy

AHC51110 Diploma of Conservation and Land Management etc
These units are listed separately throughout the documentation and appear to be duplication.
AHCLPW502A Manage wildfire hazard reduction programs
AHCFIR501A Manage wildfire hazard reduction programs

AHC51110 Diploma of Conservation and Land Management
AHCILM509A Plan burning activities for natural and cultural resource management
is a duplicate of
FPINCR034A Utilise burning for natural and cultural resource management
from AHC31410 Certificate III in Conservation and Land Management.
AHCILM509A This unit, which has not been completed and checked properly, has had inconsistent allocation into widely
different qualification levels.

AHCWRK511A Develop workplace policy and procedures for sustainability = from BSBSUS501A Develop workplace policy
and procedures for sustainability
Why has this unit been developed directly from BSB07 when the BSB07 unit is already endorsed?

AHCWRK209A Participate in environmentally sustainable work practices = from BSBSUS201A: Participate in
environmentally sustainable work practices
Why has this unit been developed directly from BSB07 when the BSB07 unit is already endorsed?

Ditto:
BSBSUS301A Implement and monitor environmentally sustainable work practices
AHCWRK313A Implement and monitor environmentally sustainable work practices

Are there sufficient divergences ot outcomes to justify separate units in these instances:
FDFCORQFS3A Implement quality and food safety programs
AHCWRK306A Comply with industry quality assurance requirements
Ditto:
AHCWRK206A Observe enterprise quality assurance procedures
FDFCORFSY2A Apply the food safety program and procedures.doc

Are there qualifications that contain the Cert III Biosecurity units?
The outcomes of these units have substantial overlap of outcomes with several other AHC10 units.
AHCBIO303A Carry out emergency disease or plant pest control procedures at infected premises
AHCBIO304A Carry out movement and security procedures
AHCBIO301A Work effectively in an emergency disease or plant pest response

AHCBIO302A Identify and report unusual disease or plant pest signs
duplicates
AHCPMG305A Identify and report unusual disease or plant pest signs
and also duplicates
AHCPMG302A Control plant pests, diseases and disorders
to which the reporting requirements can be added as a PC or Element rather than having a entire separate unit

AHC50610 Diploma of Landscape Design
AHCPGD505A Maintain a professional gardening standard
duplicates
AHCPCM504A Design and maintain a specialised landscape

General unit duplications - New
AHCILM302A Provide appropriate information on cultural knowledge
AHCIRG307A Recommend irrigation products and services
AHCMER302A Provide advice on hardware products
AHCMER303A Sell products and services
AHCNSY304A Deliver and promote sales of plants
AHCPCM302A Provide information on plants and their culture
AHCWRK307A Develop and apply fertiliser and soil ameliorant product knowledge

AHCMER402A Provide advice and sell machinery
AHCMER403A Provide advice and sell farm chemicals
AHCMER404A Provide advice on agronomic products
AHCMER405A Provide advice on livestock products
AHCMER406A Provide information on fertilisers and soil ameliorants
AHCPCM401A Recommend plants and cultural practices
AHCWRK402A Provide information on issues and policies

8.   DUPLICATION OF QUALIFICATIONS

These qualifications have identical outcomes.
AHC31410 Certificate III in Conservation and Land Management
and
AHC31910 Certificate III in Weed Management

These qualifications have identical outcomes.
AHC31410 Certificate III in Conservation and Land Management
and
AHC31810 Certificate III in Vertebrate Pest Management

What is the difference between these qualifications relating to the same job role and work outcomes with identical core units within the qualifications and near identical Elective group units?
AHC31410 Certificate III in Conservation and Land Management
AHC31510 Certificate III in Indigenous Land Management
AHC31610 Certificate III in Lands, Parks and Wildlife
AHC31710 Certificate III in Natural Area Restoration

It is possible to attain FOUR separate qualification titles with an identical set of units of competency.

       CORE UNITS
       Occupational Health and Safety
       AHCOHS301A Contribute to OHS processes
       Work
       AHCWRK313A Implement and monitor environmentally sustainable work practices

       ELECTIVE UNITS
       Natural area restoration
       AHCNAR301A Maintain natural areas
       AHCNAR303A Implement revegetation works
       Pest management
       AHCPMG301A Control weeds
       Chemicals
       AHCCHM303A Prepare and apply chemicals
       AHCCHM304A Transport, handle and store chemicals
       AHCCHM305A Operate chemical application machinery and equipment
       Plants
       AHCPCM302A Provide information on plants and their culture
       AHCPCM303A Identify an unknown plant specimen
       Work
       AHCWRK303A Respond to emergencies
       AHCWRK304A Respond to rescue incidents
       AHCWRK305A Coordinate work site activities
       AHCWRK309A Maintain and monitor environmental work practices
       CPPSIS4005A Collect basic GPS data
       plus any other elective from any training package or course.

These qualifications have identical outcomes.
AHC51110 Diploma of Conservation and Land Management
and
AHC51310 Diploma of Pest Management

AHC51510 Diploma of Chemical Application Technology
This entire qualification is a duplication of existing outcomes in other AHC10 qualifications and is an example of a qualification unpacked into a course and rebadged as a separate and unnecessary qualification.

9.   Errors, Omissions, Discrepancies, Inconsistencies et al

CAT template title AHC50710 Diploma of Landscape Design
contains the title coding for
AHC50610 Diploma of Landscape Design

CAT template title AHC050809 Diploma of Arboriculture
contains the title coding for
AHC50510 Diploma of Arboriculture

The **Pork Industry Stockperson Skill Set** contains elective units as an AND/OR choice.

The **Irrigation Retailer Skill Set** contains elective units as a selection choice of X number from Y total – four (4) from five (5).
This Skill Set contains the generic unit AHCWRK208A Provide information on products and services
and not the industry specific unit AHCIRG307A Recommend irrigation products and services

The **Irrigation Installer Skill Set** contains elective units as a selection choice of X number from Y total – five (5) from six (6).

The **Irrigation Operator Skill Set** contains elective units as an AND/OR choice and as a selection choice of X number from Y total – five (5) from seven (7).

The **Irrigation Agronomist Skill Set** contains elective units as a selection choice of X number from Y total, six (6), from nine (9).

The Irrigation Skill Sets provide credit towards several Certificates apart from the stated Irrigation certificate.

Reference: AHC30110 Certificate III in Agriculture
AHCSOL303A Prepare field soils
Has this unit been written?

There are no Group 2 Business units in AHC10.
The proposed Training Package can not have analysed the recognised need for business skills required for workforce development as emphasised by Environmental Scans and specifically as a project focus in Jobs Summits conducted by AgriFood Skills Australia.

AHCPHT301A Carry out a crop regulation program
Contains E3 Contains contractor identification and coordination requirements that are unsuitable for the work outcomes at this level.

AHC20110 Certificate II in Agriculture
AHCWRK206A Observe enterprise quality assurance procedures
This unit applies to all Industry sectors and not only those referenced currently.

 "covers the process of observing enterprise quality assurance procedures in agricultural production" - move to Application of unit and expand to all sectors covered by HACCP programs
1.1. Elements of the enterprise quality assurance system in relation to food safety and quality, OHS, animal welfare and biosecurity are recognised – Move these contexts out of the PCs and to the Range section
1.3. Hazards to food safety and quality are identified for work area according to enterprise guidelines - Unnecessary specification of range contextualization for for food safety and quality
1.4. Steps in producing eggs or meat or harvesting milk are identified -Unnecessary specification of industry contextualization for eggs, meat and harvesting milk
Required Knowledge: relating to food safety and quality, animal welfare and biosecurity
Are these topic areas required for a general unit on Quality Assurance? Surely not. Remove from Knowledge and add to Range
• animal production processes - Unnecessary specification of industry contextualisation

Similar response for **AHCWRK306A Comply with industry quality assurance requirements**

AHCBAC203A Assist agricultural crop harvesting
This unit contains overly prescriptive and overly detailed descriptions in performance criteria.

Reference: AHC32410 Certificate III in Irrigation
AHCIRG301A   Implement a maintenance program for an irrigation system
2.4   Servicing of mechanical equipment is undertaken according to the irrigation maintenance program.
This statement is nonsensical. The servicing IS the maintenance action. Servicing the equipment IS the maintenance program. Better specificity of performance requirements is needed here.

Reference: AHC32410 Certificate III in Irrigation
AHCIRG303A   Measure irrigation delivery system performance
E2   Monitor supply of equipment and spare parts - this element does not relate to the competency title or content and needs to be removed.

Reference: AHC30110 Certificate III in Agriculture
This qualification is missing the Biosecurity units
ALL the Horticulture qualifications are missing the Biosecurity units as requested from feedback.
Numerous of the Agriculture qualifications are missing the Biosecurity units.

AHCBIO201A Inspect and clean machinery for plant, animal and soil material
has a Critical aspects for assessment requirement that is not referenced elsewhere in the unit.
"list weeds and diseases that can be borne in plant, animal and soil material"

AHCWRK307A Develop and apply fertiliser and soil ameliorant product knowledge
This is a pure knowledge unit.

Reference: AHC32510 Certificate III in Milk Harvesting
These units have widely different outcomes and AQF level alignments and should not be aligned at the same AQF level.
AHCMKH301A Carry out minor service of milking equipment
AHCMKH305A Service and repair milking equipment
The Required Skill 'disassemble and assemble a range of milking equipment components such as pulsators, regulators.' is listed for both units and is clearly referenced in the PCs in only one of the units.

AHC32410 Certificate III in Irrigation
These units have identical outcomes and differ in the range of irrigation components.
There is no reason to have separate units covering these identical job skills in the one qualification.
It is inconceivable that they are listed as core units inside the same qualification.
AHCIRG203A Install micro-irrigation systems
AHCIRG302A Install irrigation systems

Reference: AHC32510 Certificate III in Milk Harvesting
[Job titles may include: Milk harvesting technician]
Dairy farmer job role appears in units but not in qualification title

AHC31510 Certificate III in Indigenous Land Management
This unit is included in the Unit Register but not described in the group of Imported units.
FPINCR034A Utilise burning for natural and cultural resource management

AHC31510 Certificate III in Indigenous Land Management
This unit is listed in the Group 3 units but not included in the qualification.
AHCILM301A Follow cultural protocols
and these units are missing:
FPIFGM008A Conduct seed collecting operations
FPIFGM3202A Extract seed
AHCNAR304A Undertake direct seeding / MNMOCC638A Undertake direct seeding
SITTGDE008A Research and share general information on Australian Indigenous cultures

AHC31510 Certificate III in Indigenous Land Management
These Categories are not included in this qualification.

FIRE
INFRASTRUCTURE
PARKS AND GARDENS
SOIL AND WATER CONSERVATION
TOOLS AND EQUIPMENT
VERTEBRATE PESTS

AHC31510 Certificate III in Indigenous Land Management
This qualification and unit composition has barely changed since 2002.
Review these units for inclusion as imported units:
SITXCOM002A Work in a socially diverse environment
SITHACS006A Clean premises and equipment
SITXADM001A Perform office procedures
SITXADM002A Source and present information
SITXCCS001A Provide visitor information
SITXCOM004A Communicate on the telephone
TDTE597B Carry out basic workplace calculations
SITXENV001A Participate in environmentally sustainable work practices
BSBCMN108A Develop keyboard skills
SITXINV001A Receive and store stock
SITXOHS002A Follow workplace hygiene procedures
SITTIND001A Develop and update tourism industry knowledge

AHC21010 Certificate II in Conservation and Land Management and AHC31410 Certificate III in Conservation and Land Management
This entire Category is not included in this qualification as a category.
TOOLS AND EQUIPMENT

AHC40910 Certificate IV in Conservation and Land Management
SITTGDE010A Prepare specialised interpretive content on flora, fauna and landscape
andSITTGDE012A Prepare specialised interpretive content on cultural and heritage environments
have
SITTGDE006A Prepare and present tour commentaries or activities.
listed as a co-requisite.
This unit is not listed in AHC10 for endorsement.

AHC40910 Certificate IV in Conservation and Land Management
* NB.   SITXCCS001A Provide visitor information is not a Certificate 4 level unit and may sit more appropriately in AHC10 within a Certificate II or III.

AHC51110 Diploma of Conservation and Land Management
* NB.   SITTGDE009A Interpret aspects of local Indigenous culture is not a Diploma level unit.
It is sited in the **Certificate I in Tourism** qualification from ST10I07, and may sit more appropriately in AHC10 within a Certificate II or III.

AHC51110 Diploma of Conservation and Land Management
These units are also appropriate for this qualification:
SITTGDE010A Prepare specialised interpretive content on flora, fauna and landscape
SITTGDE012A Prepare specialised interpretive content on cultural and heritage environments
SITTPPD005A Plan and develop interpretive activities
SITTPPD007A Plan and develop culturally appropriate tourism operations
SITTGDE005A Manage extended touring programs

AHCILM509A Plan burning activities for natural and cultural resource management
Required skills are duplications of the knowledge set.

AHCILM509A Plan burning activities for natural and cultural resource management
Incorrectly titled with a stated planning capacity and more accurately describes an implementation and monitoring role better suited to AQF 3 0r AQF 4 outcomes.

AHC51110 Diploma of Conservation and Land Management
These units are highly unlikely to sit easily at the same
PUAFIR406A Develop prescribed burning plans / AHCILM509A Plan burning activities for natural and cultural resource management **/** AHCLPW502A Manage wildfire hazard reduction programs / AHCFIR501A Manage wildfire hazard reduction programs

Ahhh…ok, I get it now…
AHCILM509A Plan burning activities for natural and cultural resource management
is a direct re-write of the imported unit:
FPINCR034A Utilise burning for natural and cultural resource management
which has not been completed / checked properly and has been badly categorised into a Diploma level qualification

AHC51110 Diploma of Conservation and Land Management
These units are aligned to AQF 6 outcomes and not at Diploma level as listed throughout the documentation.
SRXRES007B Undertake open space planning
SRXRES010B Protect heritage and cultural assets

Reference: AHC30710 Certificate III in Horticulture
Plants
AHCPCM201A Recognise plants
Does this unit use and refer to traditional Indigenous plant names?
Are traditional Indigenous plant and animal names used throughout the units?
Is Horticulturalist the correct spelling?

Reference: AHC30710 Certificate III in Horticulture
Units not contained in the lists of Group 3 units:
AHCWRK313A Implement and monitor environmentally sustainable work practices
AHCWRK312A Implement traffic management plans

Reference: AHC30710 Certificate III in Horticulture
The core unit AHCWRK313A Implement and monitor environmentally sustainable work practices
has AQF 4 outcomes and is relevant to job roles related to Cert IV Horticulture

AHCBIO402A Carry out field surveillance for a specific emergency disease or plant pest >AQF 3
can be combined with
AHCBIO302A Identify and report unusual disease or plant pest signs
and
AHCPMG302A Control plant pests, diseases and disorders

NB   ADD a biosecurity notification requirement to AHCPMG302A Control plant pests, diseases and disorders

AHCBIO305A Monitor and review biosecurity measures > AQF 4
can be combined with
AHCBIO401A Supervise activities on infected premises
and ADD a biosecurity notification and compliance requirement to AHCPMG408A Control weeds, pests and/or diseases

New biosecurity implementation, monitoring, management and auditing units are required.

These titles have been mixed up:
AHCBIO501A Manage active operational emergency disease or plant pest sites - New Title – AHCBIO502A Manage the implementation of an emergency disease or plant pest control program

AHCBIO502A Manage the implementation of an emergency disease or plant pest control program
can be moved to AQF 4 as Coordinate an operational biosecurity response

The title is misleading as this unit contains a mix of AQF 3 and AQF 4 outcomes and does not contain strategic processes and management outcomes requiring a Diploma level inclusion.
AHCNAR506A Develop and implement sustainable land use strategies
Re-title to **AHCNAR403A Develop and implement sustainable land use practices**
In addition, this unit has a production focus rather than a natural area restoration focus and should be re-categorised.

Review for duplication and overlap with AHCAGB401A Implement and monitor a property improvement plan

AHC50610 Diploma of Landscape Design
These units are listed in the qualification and have been endorsed by industry but are not listed in the Unit Mapping Guide nor Unit Register and are not in the Level 5 group of units.
AHCPCM503A Specify plants for landscapes
AHCPCM504A Design and maintain a specialised landscape

These missing units however are listed in the **AHC50710 Diploma of Parks and Gardens Management**
AHCPCM503A Specify plants for landscapes
AHCPCM504A Design and maintain a specialised landscape

This unit is listed in the qualification but not listed in the imported units.
PIL505A Plan the implementation of a permaculture project
Is there any copyright infringement with the use of this unit in the Training Package?

AHC50110 Diploma of Agriculture
This unit is listed in the qualification but not in the list of imported units.
BSBMGT501A Manage risk

AHC50410 Diploma of Horticulture
AHCPGD505A Conduct comprehensive inspection of park facilities
but the Unit Mapping Guide and Unit Register has these listings:
AHCPGD505A Maintain a professional gardening standard
AHCPGD505A Conduct comprehensive inspection of park facilities

AHC50410 Diploma of Horticulture
These units are in the qualification but not in the list of Imported units
PRMWM43B   Develop an environmental management strategy
PRMWM45B   Develop site safety plan

AHC30810 Certificate III in Arboriculture
This unit does not appear in the Level 3 units group and may not have even been written yet.
AHCARB310A Implement rigging and dogging in trees

AHC20510   Certificate II in Arboriculture
AHCARB207A Perform ground based rigging
This unit was agreed to by industry as a Core unit.
This unit has been taken out of the Cert II Arb qualification against the advice of industry and replaced with
AHCARB206A Undertake stump removal
and **AHCARB207A** Install tree protection devices

* There are 11 units listed in the Core section of this qualification which allows for 10 units only.

This unit is listed as **AHCLSC205A** Install tree protection devices RTF2207A in the Unit Mapping Guide
but listed as and **AHCARB207A** Install tree protection devices

* This unit is now listed twice within the qualification in BOTH the Core and Elective sections.
AHCARB206A Undertake stump removal

AHC50710 Diploma of Parks and Gardens Management
Non existent units in qualification - units are written but have not been included in the package
Dip Parks and Gardens - Specify plants/Specialised landscape
        AHCPCM503A Specify plants for landscapes
        AHCPCM504A Design and maintain a specialised landscape

AHC40110 Certificate IV in Agriculture & AHC50110 Diploma of Agriculture
There are no Pest Management units in these qualifications.

AHC51310 Diploma of Pest Management
AHCPMG506A Manage the implementation of legislation
This unit title is generic and inconsistent with the specific unit content relating to pest management.
This unit has outcomes related to AQF 4 administration outcomes and not Diploma level outcomes related to management.

AHC51010 Diploma of Sports Turf Management
Non existent units in qualification - units not written yet
        AHCTRF502A Manage a sports turf facility
        AHCTRF503A Manage sports turf renovation programs
        AHCTRF504A Develop a sports turf management program

AHC51510 Diploma of Chemical Application Technology
This is not a credible qualification for several reasons.
        There are 9 (nine) units at a Diploma level qualification.
        There are 4 (four) units with alignment to AQF 4 outcomes.
                AHCOHS401A Maintain OHS processes and not AHCOHS501A Manage OHS processes
                AHCCHM401A Minimise risk in the use of chemicals - duplicated with AHCCHM501A Develop and manage
                a chemical use strategy
                AHCWRK402A Provide information on issues and policies

SRXINU004A Promote compliance with laws and legal principles and not AHCWRK508A Interpret legislation
There are 2 (two) duplicate units.
AHCCHM401A Minimise risk in the use of chemicals
AHCCHM501A Develop and manage a chemical use strategy
The OHS unit is aligned to AQF 4 outcomes and not the Diploma level.
This unit is not included: AHCCHM403A Prepare safe operating procedures for calibration of equipment

This unit has been incorrectly titled and is not contained in the list of imported units.
BSBMGT507A Monitor environmental performance
The correct title is BSBMGT507A Manage environmental performance
This new title won't be needed as this unit has been deleted from BSB07 and is covered by a new common unit in sustainability, **BSBSUS501A Develop workplace policy and procedures for sustainability**

Other BSB07 issues:

BSBCMN206A Process and maintain workplace information > BSBINM201A Process and maintain workplace information
BSBCMN306A Produce business documents - DELETE > BSBITU306A Design and produce business documents
BSBADM311A Maintain business resources - OK
BSBEBUS302A Use and maintain and electronic mail system - DELETE > BSBITU203A Communicate electronically
BSBEBUS303A Participate in a virtual community - DELETE > BSBITU203A Communicate electronically
BSBWOR204A Use business technology - OK
BSBFIA301A Maintain financial records - OK
BSBITU306A Design and produce business documents - OK
BSBADM311A Maintain business resources - OK

BSBADM504B Plan or review administration systems - OK
BSBEBUS504A Implement an e-business strategy New unit BSBEBU501A Investigate and design e-business solutions
BSBEBUS505A Implement new technologies for business - Deleted as duplicated units in the ICA05
BSBEBUS506A Plan and develop a business website Deleted as duplicated units in the ICA05
BSBFIM501A Manage budgets and financial plans - OK
BSBHRM506A Manage recruitment, selection and induction processes - OK

BSBMGT507A Monitor environmental performance > New unit BSBSUS501A Develop workplace policy and procedures for sustainability
BSBRES401A Analyse and present research information - OK
BSBSUS501A Develop workplace policy and procedures for sustainability - OK
TLIL1907C Implement and monitor transport logistics
TLIR207C Source goods/services and evaluate contractors

Group 6
AHCBUS601A Manage capital works
AHCBUS602A Review land management plans and strategies
AHCBUS603A Develop and review a strategic plan
AHCBUS604A Design and manage the enterprise quality management system
AHCBUS605A Manage human resources
AHCBUS606A Develop a monitoring, evaluation and reporting program
AHCBUS607A Implement a monitoring, evaluation and reporting program

10.   UNIT Mapping Document / UNIT REGISTER

These units have the same coding.
AHCILM301A Propose appropriate uses of traditional customs
AHCILM301A Follow cultural protocols

These units are the same.
AHCNAR304A Undertake direct seeding

MNMOCC638A Undertake direct seeding

This unit is sited in Group 3 AND Group 5, but not Group 2 or 4.
Was any relevant mapping to AHC done for this unit?
SITGDE009A Interpret aspects of local Indigenous culture

This unit is sited in Group 3.
Was any relevant mapping to AHC done for this unit?
SITTGDE008A Research and share general information on Australian Indigenous cultures

Unit not listed in Unit Register
AHCWRK313A Implement and monitor environmentally sustainable work practices

These are typo duplicates listed in Unit Register
AHCBIO602A Develop a plant pest survey strategy
AHCPMG601A Develop a plant pest survey strategy
AHCBIO603A Develop a plant pest destruction strategy
AHCPMG602A Develop a plant pest destruction strategy
AHCLPW602A Review land management plans and strategies
AHCBUS602A Review land management plans and strategies

Deleted unit not recorded as deleted.
AHCDRY201A Carry out milking shed routines

These units are mapped to an identical RTE unit in the Unit Mapping Guide.
AHCPHT306A Establish horticultural crops RTE3029A
AHCBAC306A Establish agricultural crops RTE3029A

There are numerous examples of mapping document errors to previous versions of units.

BSBMGT501A Manage risk - DELETE > Non existent unit
AHCBUS608A Manage risk - DELETE > Use BSBRSK501A Manage risk

Recommendations for improvement to the AHC10 units of competency:

*   **Review all units for inappropriate titling and relevance to actual work outcomes.**

*   **Review all units to delete inappropriate references to unspecified documentation.**

*   **Remove or replace all examples of indeterminate commentary.**

*   **Review all units and qualifications for inclusion of appropriate references to relevant legislation.**

*   **Disaggregate multiple activity units and re-write.**

*   **Ensure the provision of a well-defined assessment focus within the PCs.**

*   **Evaluate the existence of content-free and skills deficient units in the Training Package or delete entirely if considered unnecessary or re-write with well defined assessable focus.**

*   **Review all units and qualifications for appropriate and relevant Employability Skills.**

*   **Remove all instances of duplication in units and qualifications.**

*   **Amend all units and qualifications containing errors, omissions, discrepancies and inconsistencies**

*   **Fix all errors and omissions in the UNIT Mapping Document and UNIT REGISTER.**