



Tree Felling Project Stakeholder Feedback Report: Validation

10 January 2024

Through consultations, the three tree felling units were reviewed and updated where applicable to improve deliverability, while also supporting safety and competency. The final draft units, along with proposed changes following the first stage of broad consultations, have been available for broad industry review, feedback and validation on the [project webpage](#) from 4 December to 17 December 2023.

This report collates the input received during the two information sessions held as part of the validation consultations, as well as the surveys available on the project website, email and further stakeholder engagements. This input was received from a diverse range of stakeholders as follows:

Stakeholder Type	ACT	NSW	NT	QLD	SA*	TAS	VIC	WA	National
Government Federal									
Government State						**			
Government Local									
Employer		***					***	***	
Peak Industry Body									
Regulator									
Registered Training Organisation					**				
Industry Training Advisory Board/Other		**		**					
Union									
State Training Authority (STA)	**	**		**	**				
Other JSC									
Other (industry consultants)									

* All 127 Registered Training Organisations (RTOs) that offer at least one of these units in their scope of registration received project updates and invitations to consultations. Seven of these RTOs were from South Australia; they did not participate or indicate any feedback at this stage of the project.

Additionally, Industry Training Advisory Boards (ITABs) and State Training Authorities (STAs) across all states have been engaged in this process. Furthermore, information about the project has been disseminated through the Skills Insight Stakeholder Database, reaching a significantly wider audience of stakeholders and encompassing more industry sectors.

*** Participants in the information sessions; indicated no feedback at this stage of the project.*

**** Employers primarily engaged with the project through their enterprise/government RTOs, which predominately train individuals who are direct employees.*

Below is a summary of the feedback and responses for the units of competency reviewed for the project at the broad consultation stage. This involves a consideration of the information provided, views of industry stakeholders and from people who are part of the Subject Matter Expert Working Group (SMEWG) process. Resolutions are constructed to consider the needs and views of stakeholders to the extent possible, and to comply with the Standards for Training Packages 2023. The resolutions may represent a compromise on one or more stakeholder views with the aim of a workable outcome for industry, State and Territory Training Authorities (STAs) and training providers.

Acronyms: PC - Performance Criteria, PE - Performance Evidence, KE - Knowledge Evidence, AC - Assessment Conditions, SMEs - Subject Matter Experts, SMEWG - Subject Matter Expert Working Group

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1 Supportive of the Units' Updates

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation	Northern Territory	<ul style="list-style-type: none"> • Provided support for the units' updates (basic, intermediate and advanced) through email. 	Noted. Thank you for your support.
Registered Training Organisation	Queensland	<ul style="list-style-type: none"> • Provided support for the updates to the basic, intermediate and advanced units through the survey. 	Noted. Thank you for your support.
Registered Training Organisation	Northern Territory	<ul style="list-style-type: none"> • Provided support for the updates to the basic unit through the survey. 	Noted. Thank you for your support.
Registered Training Organisation	New South Wales	<ul style="list-style-type: none"> • Provided support for the updates to the basic unit through the survey. 	Noted. Thank you for your support.
Registered Training Organisation	New South Wales	<ul style="list-style-type: none"> • Provided support for the updates to the basic, intermediate and advanced units through the survey. 	Noted. Thank you for your support.
Registered Training Organisation	Queensland	<ul style="list-style-type: none"> • Provided support for the updates to the basic, intermediate and advanced units through the survey. 	Noted. Thank you for your support.
Registered Training Organisation	Queensland	<ul style="list-style-type: none"> • Provided support for the updates to the basic, intermediate and advanced units through the survey. 	Noted. Thank you for your support.

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation	New South Wales	<ul style="list-style-type: none"> • Provided support for the updates to the basic and advanced units through the survey. 	Noted. Thank you for your support.
Registered Training Organisation	New South Wales	<ul style="list-style-type: none"> • Provided support for the updates to the advanced unit through the survey. 	Noted. Thank you for your support.
Registered Training Organisation	New South Wales	<ul style="list-style-type: none"> • Did not provide support for the updates to the basic and advanced units through the survey. <p>Quote: "Less trees makes it a safety issue. Participants are not able to receive enough practise with reduced trees to ensure competency."</p>	<p>Noted. Thank you for your feedback.</p> <p>The project page offers detailed information regarding the updates made to these units, along with the reasoning behind such decisions. Collectively, these changes aim to support high standards of safety and robust assessment of competency, while reducing the barrier around availability of practice trees.</p>

2 Unit Application – Unsupportive of Pre-existing Skill Statement

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
State Training Authority	Victoria	<ul style="list-style-type: none"> Indicated that the statement regarding pre-existing skills and knowledge in the Application section is misleading. These statements could be interpreted by Registered Training Organisations (RTOs) as mandatory, despite the absence of requirements for pre-requisite units. Proposed that this advisory text about prior skills and knowledge should be removed from the Application section and instead be incorporated in the User Guide. Supported the need to clarify pre-requisite units in a future review of the units. 	<p>Addressed. Thank you for your feedback.</p> <p>The recommendation regarding prior skills and knowledge in the Application was subject to an additional review by the Quality Assurance team. This review concluded that modifications were required to align the content with the requirements set in the Standards for Training packages for the Application.</p> <p>The Standards specify that the Application may include <i>"focused, useful information on how and where the unit of competency could be practically applied and who might use it."</i></p> <p>In consideration of these requirements, the recommendation has been removed from the Application. However, a clarification has been incorporated into an existing paragraph across all three units to clarify the applicability of these units.</p> <p>The amended paragraph in the Application is as follows:</p> <p><i>"The unit applies to individuals who possess existing proficiency in operating a chainsaw and are required to fell basic trees as part of arboriculture, forestry, agriculture, conservation</i></p>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation	Queensland; New South Wales	<ul style="list-style-type: none"> • Sought clarification about requirement for chainsaw experience in the Application section, but no pre-requisites listed. 	<p><i>and land management, local government, emergency services and other government agency operations. With the exception of minor forest produce, this unit does not apply to commercial harvesting operations."</i></p> <p>It should be noted that the recommendation outlined in the Companion Volume User Guide remains unaltered to underscore the importance of prior skills and safety, a critical issue identified by SMEs and a major driving force behind the project.</p> <p>Addressed. Thank you for your feedback.</p> <p>The recommendation regarding prior skills and knowledge in the Application was subject to an additional review by the Quality Assurance team. This review concluded that modifications were required to align the content with the requirements set in the Standards for Training packages for the Application.</p> <p>The Standards specify that the Application may include <i>"focused, useful information on how and where the unit of competency could be practically applied and who might use it."</i></p> <p>In consideration of these requirements, the recommendation has been removed from the Application. However, a clarification has been</p>

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			<p>incorporated into an existing paragraph across all three units to clarify the applicability of these units.</p> <p>The amended paragraph in the Application is as follows:</p> <p><i>“The unit applies to individuals who possess existing proficiency in operating a chainsaw and are required to fell basic trees as part of arboriculture, forestry, agriculture, conservation and land management, local government, emergency services and other government agency operations. With the exception of minor forest produce, this unit does not apply to commercial harvesting operations.”</i></p> <p>It should be noted that the recommendation outlined in the Companion Volume User Guide remains unaltered to underscore the importance of prior skills and safety, a critical issue identified by SMEs and a major driving force behind the project.</p>
State Training Authority	Victoria	<ul style="list-style-type: none"> Expressed concerns that the statement in the unit application about pre-existing skills and knowledge effectively acts as a 'pseudo-pre-requisite' without formally being one, as there is no official pre-requisite unit. This could be seen as misleading and against the requirements 	<p>Addressed. Thank you for your feedback.</p> <p>The recommendation regarding prior skills and knowledge in the Application was subject to an additional review by the Quality Assurance team. This review concluded that modifications were required to align the content with the</p>

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		<p>set in the Standards for Training Packages, indicating that any recommendation-related content should be included in the Companion Volume User Guide.</p>	<p>requirements set in the Standards for Training packages for the Application.</p> <p>The Standards specify that the Application may include <i>"focused, useful information on how and where the unit of competency could be practically applied and who might use it."</i></p> <p>In consideration of these requirements, the recommendation has been removed from the Application. However, a clarification has been incorporated into an existing paragraph across all three units to clarify the applicability of these units.</p> <p>The amended paragraph in the Application is as follows:</p> <p><i>"The unit applies to individuals who possess existing proficiency in operating a chainsaw and are required to fell basic trees as part of arboriculture, forestry, agriculture, conservation and land management, local government, emergency services and other government agency operations. With the exception of minor forest produce, this unit does not apply to commercial harvesting operations."</i></p> <p>It should be noted that the recommendation outlined in the Companion Volume User Guide remains unaltered to underscore the importance of prior skills and safety, a critical issue identified</p>

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State Training Authority	Western Australia	<ul style="list-style-type: none"> Indicated that the following statement found within the basic tree-felling unit raised concerns, as the term "Duty of Care" is limited to the training provider and not the legally responsible organisation: <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in the safe startup, shutdown, maintenance, and operations of a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i> 	<p>by SMEs and a major driving force behind the project.</p> <p>Addressed. Thank you for your feedback.</p> <p>The statement mentioned has been removed from the Application section following the feedback received and further assessment. However, a clarification has been incorporated into an existing paragraph across all three units to clarify the applicability of these units.</p> <p>The amended paragraph in the Application is as follows (e.g. below from FWPCOT2275):</p> <p><i>"The unit applies to individuals who possess existing proficiency in operating a chainsaw and are required to fell basic trees as part of arboriculture, forestry, agriculture, conservation and land management, local government, emergency services and other government agency operations. With the exception of minor forest produce, this unit does not apply to commercial harvesting operations."</i></p>

3 Assessment Criteria – Risk Assessment

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation	New South Wales	<ul style="list-style-type: none"> Highlighted that, despite the new reference to documented hazard and risk assessment in the Assessment Criteria of the intermediate and advanced units, there is no explicit mention of this concept in their Performance Criteria. 	<p>Addressed. Thank you for this feedback.</p> <p>Performance Criteria 1.3 has been updated to address the identified misalignment in the two parts of the unit. The amendment is as follows:</p> <p><i>“1.3 Identify hazards, assess risks, determine appropriate control measures and record findings, to mitigate risks and hazards associated with felling intermediate trees by conducting a documented risk assessment according to workplace procedures”</i></p>
Industry Training Advisory Board/Other	Western Australia	<ul style="list-style-type: none"> Highlighted that, despite the new reference to documented hazard and risk assessment in the Assessment Criteria of the intermediate unit, there is no explicit mention of this concept in their Performance Criteria. <p>Quote: <i>“For FWPCOT3350 Fell Tree Manually (Intermediate), wording in the Performance Criteria needs to be reviewed to include specifics around conducting a formalised Risk Assessment (and evidence of this could be listed under “Performance Evidence”). At present, the Performance</i></p>	<p>Addressed. Thank you for this feedback.</p> <p>Performance Criteria 1.3 has been updated to address the identified misalignment in the two parts of the unit. The amendment is as follows:</p> <p><i>“1.3 Identify hazards, assess risks, determine appropriate control measures and record findings, to mitigate risks and hazards associated with felling intermediate trees by conducting a documented risk assessment according to workplace procedures”</i></p>

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		<p><i>Criteria refer to risk assessment activities, but there is no requirement to log or record activities in a formal manner. A formal written risk assessment should be done according to the responsible organisation's established process and systems where available."</i></p>	
State Training Authority	Western Australia	<ul style="list-style-type: none"> Highlighted that, despite the new reference to documented hazard and risk assessment in the Assessment Criteria of the intermediate unit, there is no explicit mention of this concept in their Performance Criteria. 	<p>Addressed. Thank you for this feedback.</p> <p>Performance Criteria 1.3 has been updated to address the identified misalignment in the two parts of the unit. The amendment is as follows:</p> <p><i>"1.3 Identify hazards, assess risks, determine appropriate control measures and record findings, to mitigate risks and hazards associated with felling intermediate trees by conducting a documented risk assessment according to workplace procedures"</i></p>
Registered Training Organisation	Queensland	<ul style="list-style-type: none"> Indicated that mandating more than one documented risk assessment could unnecessarily extend course duration or necessitate an additional person to assist assessors in evaluating the risk assessments. Proposed to maintain a minimum requirement of one documented risk assessment. 	<p>Addressed. Thank you for this feedback.</p> <p>The assessment requirement for both basic and advanced levels has been updated to include a demonstration of <i>"documented risk assessment"</i> for a minimum of one tree. In the intermediate unit, the requirement has been altered to require <i>"documented risk assessment for "one felled tree,"</i> as opposed to two.</p>

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Registered Training Organisation	Victoria	<ul style="list-style-type: none"> Highlighted the importance of risk assessments that not only consider pre-felling activities but also account for variables and unforeseen events during felling. Also emphasised that risk assessment is especially crucial at the basic level. 	<p>The revised statement for each unit is as follows: <i>"There must also be evidence that the individual has documented risk assessment for at least one of the felled trees. This documentation must detail localised hazards and risks associated with tree felling and specify methods to minimise these risks."</i></p> <hr/> <p>Addressed. Thank you for this feedback.</p> <p>The assessment requirement for both basic and advanced levels has been updated to include a demonstration of <i>"documented risk assessment"</i> for a minimum of one felled tree. In the intermediate unit, the requirement has been altered to require documented risk assessment for <i>"one felled tree,"</i> as opposed to two assessed trees.</p> <p>The revised statement for each unit is as follows: <i>"There must also be evidence that the individual has documented risk assessment for at least one of the felled trees. This documentation must detail localised hazards and risks associated with tree felling and specify methods to minimise these risks."</i></p>

4 Assessment Criteria – Advanced Tree felling

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation	New South Wales	<ul style="list-style-type: none"> Suggested defining large diameter trees in the assessment criteria of the advanced unit. <p>Quote: <i>“The requirement of large diameter tree. Can large diameter tree be defined within the performance evidence. Example 1.0m dia at 0.9m from the base. The intent of a large diameter tree is to have the candidate cut from both sides of the tree during the scarf and back cut and possibly removing some of the internal wood by plunging in from the scarf. Large diameter trees 1.2m and above are becoming difficult to access and generally are habitat trees.”</i></p>	<p>Addressed. Thank you for your feedback.</p> <p>Refraining from specifying the diameter of trees is a deliberate choice to avoid constraining access to trees further. Instead, clarity can be provided on the type of cuts (the technique) expected to be executed in relation to large diameter trees. Accordingly, the requirement has been amended as follows:</p> <p><i>“at least one tree that can be safely felled using one of the following complex felling techniques:</i></p> <ul style="list-style-type: none"> <i>centre scarf technique</i> <i>executing cuts from both sides of the tree during the scarf and back cut.”</i>
Registered Training Organisation	Queensland	<ul style="list-style-type: none"> Pointed out the necessity of using correct terminology in the Performance Evidence, such as the “centre scarf technique” and suggested adding more criteria for trees “exhibiting damage or defect” to enhance flexibility in assessment. 	<p>Addressed. Thank you for your feedback.</p> <p>The criteria within the Performance Evidence have been updated as following:</p> <p><i>“The trees must be chosen according to the following criteria:</i></p> <ul style="list-style-type: none"> <i>at least one tree to be selected from:</i> <ul style="list-style-type: none"> <i>tree with a lean and a weight distribution that adds significant complexity, yet can be assessed and adapted to site requirements</i>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation	Victoria	<ul style="list-style-type: none"> Pointed out the necessity of using correct terminology in the Performance Evidence, such as the <i>“centre scarf technique”</i> and suggested adding more criteria for trees <i>“exhibiting damage or defect”</i> to enhance flexibility in assessment. 	<ul style="list-style-type: none"> <i>tree leaning in a direction away from the fall zone, or side-leaning towards the available fall zone</i> <i>at least one tree with a heavy forward lean</i> <i>at least one tree that can be safely felled using one of the following complex felling techniques:</i> <ul style="list-style-type: none"> <i>centre scarf technique</i> <i>executing cuts from both sides of the tree during the scarf and back cut</i> <i>at least one tree exhibiting damage, defect or complex structure that requires complex felling techniques to be selected from the following:</i> <ul style="list-style-type: none"> <i>tree with visible lightning damage</i> <i>tree that is burnt out or has a fire-damaged butt</i> <i>trees with complex multi-stems</i> <i>tree with multi-legged growth or large multiple leaders</i> <i>tree with a hollow</i> <i>tree that is stag-dead or alive but in an advanced stage of decay</i> <i>tree with complex large low branches.”</i> <p>Addressed. Thank you for your feedback.</p> <p>The criteria within the Performance Evidence have been updated as following:</p> <p><i>“The trees must be chosen according to the following criteria:</i></p> <ul style="list-style-type: none"> <i>at least one tree to be selected from:</i>

Organisation	State	Stakeholder Feedback	Consideration and Proposed Resolution
			<ul style="list-style-type: none"> • <i>tree with a lean and a weight distribution that adds significant complexity, yet can be assessed and adapted to site requirements</i> • <i>tree leaning in a direction away from the fall zone, or side-leaning towards the available fall zone</i> • <i>at least one tree with a heavy forward lean</i> • <i>at least one tree that can be safely felled using one of the following complex felling techniques:</i> <ul style="list-style-type: none"> • <i>centre scarf technique</i> • <i>executing cuts from both sides of the tree during the scarf and back cut</i> • <i>at least one tree exhibiting damage, defect or complex structure that requires complex felling techniques to be selected from the following:</i> <ul style="list-style-type: none"> • <i>tree with visible lightning damage</i> • <i>tree that is burnt out or has a fire-damaged butt</i> • <i>trees with complex multi-stems</i> • <i>tree with multi-legged growth or large multiple leaders</i> • <i>tree with a hollow</i> • <i>tree that is stag-dead or alive but in an advanced stage of decay</i> • <i>tree with complex large low branches."</i>

5 Assessment Criteria – Intermediate Tree Felling

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation	New South Wales	<ul style="list-style-type: none"> Highlighted wording in the Performance Evidence of the intermediate unit that could potentially lead to confusion. Specifically, the phrase “measuring tree diameter at 1.3 meter above the ground” was interpreted to mean that the scarf cut is required to be made at this height. <p>Quote: “The 1.3m height from ground level to obtain a diameter measurement for intermediate trees. Most competent chainsaw operators will commence their scarf cut at a comfortable height around 0.9m from ground level. Cutting at 1.3m adds extra risk to the operator. Cutting at 1.3m would exclude many trees that could be utilised.”</p>	<p>Addressed. Thank you for your feedback.</p> <p>To eliminate the confusion, the requirement has been revised to state “<i>measured at the point where the scarf cut is made</i>”. This change is shown below:</p> <p><i>“at least one tree must have a diameter, measured at the point where the scarf cut is made, that is smaller than chainsaw bar length”.</i></p>
Registered Training Organisation	Queensland; New South Wales	<ul style="list-style-type: none"> Highlighted an issue with the wording in the Performance Evidence of the intermediate unit that could lead to confusion. Specifically, the phrase 'measuring tree diameter at 1.3 meters above the ground' has been interpreted 	<p>Addressed. Thank you for your feedback.</p> <p>To eliminate the confusion, the requirement has been revised to state “<i>measured at the point where the scarf cut is made</i>”. This change is shown below:</p>

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Registered Training Organisation	Victoria	<p>by some to mean that the scarf cut is required to be made at this height.</p> <ul style="list-style-type: none"> Expressed concern that under the current Performance Criteria for the intermediate unit, a student who has successfully and competently felled four large trees (including leaning), each exceeding the size of the bar, cannot be formally deemed competent if they have not felled a small diameter tree (lower than the bar length). Made also a second point regarding the impact of these criteria on RTOs who may have access to larger trees but not to smaller ones. <p><i>Quote: "While I understand that a leaning tree is desirable what is the outcome of a small tree and a large tree. E.g. If my student cuts down three large leaning trees competently, larger than the bar size, due to the prescription they cannot be deemed competent as they are not competent as they haven't done a small tree."</i></p>	<p><i>"at least one tree must have a diameter, measured at the point where the scarf cut is made, that is smaller than chainsaw bar length".</i></p> <p>Noted. Thank you for your feedback.</p> <p>In response to this feedback, we engaged in discussions with the respective stakeholder and Technical Committee members to clarify the original intent of the criteria related to the tree's diameter and lean that were introduced in the Performance Evidence of the intermediate unit. These discussions aimed to consider any potential adjustments. It was communicated to the stakeholders that, due to the current project phase and timelines, we are limited to implementing only minor changes. These changes must be straightforward for the Technical Committee to evaluate and approve or disapprove without extensive discussions.</p> <p>The evaluations led to the following conclusions:</p> <ol style="list-style-type: none"> 1. The definition of a tree at the intermediate level was revised in the major review of the units in 2020. It now describes 'small or medium size diameter trees that can be safely felled using intermediate felling techniques.' Previously, the definition specified 'trees with a diameter larger than the chainsaw bar length,' excluding smaller

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			<p>trees. This change made in 2020 implies that small-diameter trees are now included in both the basic and intermediate units.</p> <p>2. The criteria introduced in the Performance Evidence for this project require the felling of trees smaller and larger than the chainsaw bar length at the intermediate level. This requirement was established to ensure that students demonstrate back cut techniques that vary between trees with a diameter smaller than the chainsaw bar length and those with a larger diameter. It should be noted from point 1 above that the definition of an intermediate tree now encompasses trees of small or medium size diameter.</p> <p>The stakeholders we consulted recognised that the issues raised in this feedback stem from the current definition of an intermediate tree, especially regarding its size. They acknowledged the need for a pragmatic approach, accepting that alterations to the tree's definition are not feasible within the scope of this project. However, they proposed the need for a more comprehensive discussion and consensus among the various users of these units to clearly differentiate the range and complexity of skills and assessment criteria across different skill levels. They suggested that this be recorded in the</p>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			issues register for consideration during future reviews of the units.
Registered Training Organisation	Victoria	<ul style="list-style-type: none"> Indicated misalignment between the Performance Criteria and Performance Evidence of the Assessment Criteria as follows: <p>Quote: <i>“Element 5.4 refers to sharpening but not referred to in Performance evidence. This is a critical skill that should be demonstrated at this level.”</i></p>	<p>Addressed. Thank you for your comment and suggestion.</p> <p>The relevant requirement in the Performance Evidence has been amended to include sharpening. It now reads as following:</p> <p><i>“There must also be evidence that the individual has sharpen one chain, inspected and carried out routine maintenance on one chainsaw and its cutting attachments on one occasion according to manufacturer requirements.”</i></p>

6 Request for Clarification on the Lack of Prerequisite Units

Considerable feedback was received regarding prerequisite units, which was outside the scope of this project. As they are currently written, the units and Companion Volume User Guide leave discretion to RTOs in determining learner suitability to undertake each level of tree felling unit. While there is strong stakeholder support for prerequisites to provide additional guidance on learner suitability, this was outside of the scope of this project. Given the complexity of the issue, we have compiled a document outlining stakeholder preferences at this stage and explaining the [Challenges in Establishing Prerequisites for Tree Felling Units](#). The topic has been recorded in the Issues Register as something to be consulted on and addressed in a future, in depth review of the units.

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Industry Training Advisory Board/Other	Western Australia	<ul style="list-style-type: none"> Indicated the need for a pre-requisite unit for the tree felling units. Sought clarifications on why pre-requisite units are not possible. <p><i>Quote: "It is felt that specifically that a unit providing training and assessment in the use of a chainsaw is required (chainsaw ticket). It is unclear how the following was concluded, which forms part of the summary of Feedback document provided:</i></p> <p><i>However, after extensive discussions and a rigorous review of the potential options for prerequisite units, it was determined that none of the available options are compliant with the Training Package Organising Framework</i></p> <p><i>Stakeholders would benefit from a clarification on the above."</i></p>	<p>Noted. Thank you for your feedback.</p> <p>Detailed information about prerequisite challenges has been provided to this stakeholder. To view this information, please refer to the document "Challenges in Establishing Prerequisites for Tree Felling Units", which is available above or on the project's webpage.</p> <p>In addition, following recommendations received during the course of this project for a more effective resolution of issues related to the allocation of prerequisite units, and considering the stakeholders' support for prerequisite units, it is suggested that any future review of these units focus on identifying the unique and essential skills required at each level of competency and possibly revising the units to accurately encompass these skills in their content. This suggestion has been recorded in the issues register and will be given due consideration during the future review of these units.</p>
Registered Training Organisation	Queensland, Western Australia, Victoria	<ul style="list-style-type: none"> Indicated the need for a pre-requisite unit for the tree felling units. <p><i>Quote: "There should be a pre-requisite unit for at least the Intermediate and Advance tree felling units. The pre-requisite for Intermediate should be a</i></p>	<p>Noted. Thank you for your feedback.</p> <p>Detailed information about prerequisite challenges has been provided to this stakeholder. To view this information, please refer to the document "Challenges in Establishing</p>

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		<p><i>relevant Chainsaw operation unit, such as AHCMOM213 as it trains a person how to use a chainsaw and includes WHS and risk assessments elements or FWPCOT2239 which includes the chainsaw usage, maintenance and includes WHS and risk assessments elements. I would then require the Tree Felling Intermediate unit to be a pre-requisite for Advanced tree felling unit.</i></p> <p><i>This approach is based on the high-risk nature of the units. Furthermore, to progress to the advanced level one needs to master the lower [intermediate level], this is similar to most licensing requirements, such as heavy vehicles. In addition to the WHS and risk assessment elements we also need to consider the environmental impact on having persons fell trees without knowing how to actual use and maintain the principal tool to complete the task. A task that is potentially high-risk to the individual and those around. In addition, it can result in significant damage to surrounding vegetation, erode soil and bring about destruction to native habitats and the local eco system ... and so forth ... including the creation of fire-hazards."</i></p>	<p>Prerequisites for Tree Felling Units", which is available above or on the project's webpage.</p> <p>In addition, following recommendations received during the course of this project for a more effective resolution of issues related to the allocation of prerequisite units, and considering the stakeholders' support for prerequisite units, it is suggested that any future review of these units focus on identifying the unique and essential skills required at each level of competency and possibly revising the units to accurately encompass these skills in their content. This suggestion has been recorded in the issues register and will be given due consideration during the future review of these units.</p>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
State Training Authority	Western Australia	<ul style="list-style-type: none"> Indicated the need for a pre-requisite unit for the tree felling units. <p><i>Quote: "Several participants commented on the need for prerequisites in operating chainsaws. The current content was assuming that someone who is about to fell a tree, has the appropriate skills and knowledge to handle a chainsaw. Whilst it is acknowledged that the user guide provides a "strong recommendation" for chainsaw knowledge, stakeholders said that this does not go far enough.</i></p> <p><i>Western Australia seeks clarification on the summary of feedback comments "...after extensive discussions and a rigorous review of the potential options for prerequisite units, it was determined that none of the available options are compliant with the Training Package Organising Framework" as we would like to understand the issue in more detail from your perspective."</i></p>	<p>Noted. Thank you for your feedback.</p> <p>Detailed information about prerequisite challenges has been provided to this stakeholder. To view this information, please refer to the document "Challenges in Establishing Prerequisites for Tree Felling Units", which is available above or on the project's webpage.</p> <p>In addition, following recommendations received during the course of this project for a more effective resolution of issues related to the allocation of prerequisite units, and considering the stakeholders' support for prerequisite units, it is suggested that any future review of these units focus on identifying the unique and essential skills required at each level of competency and possibly revising the units to accurately encompass these skills in their content. This suggestion has been recorded in the issues register and will be given due consideration during the future review of these units.</p>
Industry Training Advisory Board/Other	Western Australia	<ul style="list-style-type: none"> Raised the question of whether the current project's scope can be adjusted to allow further consultation on prerequisites. 	<p>Noted. Thank you for your question.</p> <p>Yes, there is a process whereby Skills Insight as the Job Skills Council can discuss the need to change the scope of a project with Department of Employment and Workplace Relations. However, considering the complexities surrounding the</p>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Industry Training Advisory Board/Other	Western Australia	<ul style="list-style-type: none"> • Sought clarification as to the reason that AHCMOM213 Operate and Maintain Chainsaws could not be included as a prerequisite. <p>Quote: "If the challenge was that consensus amongst stakeholders was not reached, is it possible to confirm that a process is in place to obtain consensus and whether this was initiated within this project?"</p>	<p>prerequisite topic, we anticipate that reaching a solution and gaining broad consensus will be a lengthy process. This could significantly delay the implementation of the changes that this project was approved for. This was a priority and fast-tracked project.</p> <hr/> <p>Noted. Thank you for your question.</p> <p>Consensus around the need to include prerequisites was not considered in this project for the following reasons:</p> <p>The proposal for prerequisites was raised and consulted on in both the most recent review in 2022 as part of release 8.0 (published in Jan 2023) and the full unit review in 2020 as part of release 6.0 (published Dec 2020).</p> <p>Feedback collected during these projects both concluded to not add prerequisite units and for training providers to maintain their own practices to address entry into these units on the basis of existing training or experience to promote safety. This has been enhanced through the current project with the development of the User Guide: Fell Trees Manually which supports a high standard of safety and robust assessment of competency, and in edits to the unit applications.</p>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation	Victoria	<ul style="list-style-type: none"> Indicated concerns about the lack of prerequisite units for the tree felling units. <p><i>Quote: "The issue of pre requisites for the felling units, needs to be developed in parallel to this project. Am happy to support the revised wording as a compromise but it needs to be recognised that if a person is enrolled without skills"</i></p>	<p>The unit <i>AHCMOM213 Operate and maintain chainsaws</i> could be an appropriate unit for individuals to complete prior to enrolment in the tree felling units; however, it is not the only pathway an individual can undertake to demonstrate chainsaw skills and knowledge. Discussions were raised during both feedback phases on the inclusion of prerequisites, the feedback received did not reach a consensus on adding this one unit as a prerequisite. Support was received to include language in the unit applications to direct RTOs to the User Guide: <i>Fell Trees Manually</i>, which provides guidelines that underscore the importance of safety and the duty of care of training providers. It entrusts training providers with the responsibility to consider prior skills and integrate it into their risk assessment processes.</p> <p>Noted. Thank you for your feedback.</p> <p>Detailed information about prerequisite challenges has been provided to this stakeholder. To view this information, please refer to the document "Challenges in Establishing Prerequisites for Tree Felling Units", which is available above or on the project's webpage.</p> <p>In addition, following recommendations received during the course of this project for a more</p>

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		<p><i>there is significant risk to the trainee without pre training.</i></p> <p><i>In its barest form the competency would need to be rewritten to include a raft of chainsaw skills criteria if prior skills are not required."</i></p>	<p>effective resolution of issues related to the allocation of prerequisite units, and considering the stakeholders' support for prerequisite units, it is suggested that any future review of these units focus on identifying the unique and essential skills required at each level of competency and possibly revising the units to accurately encompass these skills in their content. This suggestion has been recorded in the issues register and will be given due consideration during the future review of these units.</p>

7 Other Feedback

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation	New South Wales	<ul style="list-style-type: none"> Highlighted an inadequate use of the term "lock out" in Performance Criteria 1.5, across all three units. <p><i>Quote: "Element 5. Maintain chainsaw and cutting attachments. Performance Criteria 5.1 Follow workplace health and safety procedures and manufacturer instructions to lock out equipment. Lock out within industry is where a component has the source of energy shut down, then verified</i></p>	<p>Adopted. Thank you for your feedback.</p> <p>This Performance Criteria has been amended in all the units by replacing the words "lock out" with "deactivate and isolate" as shown below:</p> <p><i>"5.1 Follow workplace health and safety procedures and manufacturer instructions to deactivate and isolate equipment."</i></p>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<p><i>the source of energy cannot activated and then a lock is clasped around the isolation point so the component cannot be activated.</i></p> <p><i>Chainsaws cannot be locked out as there is no definitive point where a lock can be clasped to stop activation.</i></p> <p><i>I did see on one of the proposals where lock out had been deleted and other wording added.</i></p> <p><i>What does lock out mean in the element. Cannot be inadvertently started or tagged out of service to inform others of an unserviceable chainsaw. This needs to be defined as there is no reference to lock out within the Stihl, Husqvarna or Echo manuals"</i></p>	
State Training Authority	Western Australia	Quote: <i>"Western Australia understands there can be confusion between the term "pre-requisite" and "entry requirements" used within the summary of feedback document on the project page website."</i>	<p>Addressed. Thank you for your comment.</p> <p>The prior skills and knowledge statement from the Application of each unit has been removed following feedback received and further assessments, which should eliminate the confusion.</p> <p>However, the User Guide still refers to <i>"Pre-Existing Skills and Knowledge"</i> to describe the sequence of recommended (not mandatory) skills and</p>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			knowledge verification for prospective tree felling trainees.
Registered Training Organisation	Queensland; New South Wales	<p>Quote: <i>“Basic tree felling: We noted there is nothing specific to identify the size of the trees relevant to this level of competency: that the trees should not be greater than the bar length, and then that the chainsaw used should have a bar length appropriate to tree diameter.”</i></p>	<p>Noted. Thank you for your comment.</p> <p>For the basic trees, the only criterion related to tree size is in the Application as follows.</p> <p><i>“small or medium diameter that is not more than chainsaw bar length and can be safely felled using standard and basic felling techniques”</i></p>
Registered Training Organisation	Northern Territory	<ul style="list-style-type: none"> Highlighted the effects that tree suitability and numbers have on First Nations People and their country. <p>Quote: <i>“As we primarily deal with First Nations People on their country the effects of finding and cutting of more trees than are useable and indeed sustainable considering that if a resource is cut then it should be used.</i></p> <p><i>This has raised concerns from Traditional Owners as to why so many trees need to be cut. Yes, we talk about the reasons why and the requirements of the “Government” however this is a rather hard sell sometimes.</i></p>	<p>Noted. Thank you for your comments.</p> <p>Your insights regarding the concerns of First Nations clients are invaluable and have been noted since the previous stage of consultation. They contribute significantly to our understanding of various factors, being an addition to environmental and cultural heritage protection legislation and policies, which influence the limited availability of trees for some training providers. Conversely, the safety and quality of training and assessment are critical in delivering these units, and these aspects have also been thoroughly considered in the development of this project.</p> <p>As a result, the solution concerning the tree number in the assessment criteria has been approached with careful consideration by acknowledging the necessity to balance the two</p>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<p><i>I realise at this point the project is almost complete and will not be changed at this current stage and I have supported it.</i></p> <p><i>I would like to flag the consideration of cultural understanding in further reviews be noted and a compromise situation that could be arrived at to alleviate these cultural concerns put forward.</i></p> <p><i>I understand that it could be we are only teaching local people new skills, and this is true however it does not transcend a very deep culture, law and rules as to the use of natural resources."</i></p>	<p>sides of the issue or different perspectives. The project page and the summary of the feedback report detail the rationale behind the decision on the number of trees for assessment, which aims to provide a balanced perspective.</p> <p>Additionally, other supportive strategies were discussed during the project, and they include forming partnerships with relevant entities for tree allocation and employing virtual technology for imparting basic concepts before the practical application on real trees during training sessions. While these suggestions are outside the scope of this project, they are invaluable for future consideration and may lead to the proposal of additional activities.</p>
Industry Training Advisory Board/Other	Western Australia	<ul style="list-style-type: none"> • Indicated that Western Australia generally prefers having more trees available for assessment, as it is believed to reinforce safety knowledge more effectively. However, Western Australia is not opposed to reducing the number of trees used for assessment. • Indicated also that Western Australia stakeholders agree that the whole learning journey, and performance overtime of the individual, must be given due consideration, rather than relying 	<p>Noted. Thank you for this comment.</p> <p>The project conducted a thorough review of all feedback received at the 'Broad consultation' stage and suggests that the number of trees to demonstrate competence at each level remains the same as proposed previously, specifically 3, 4 and 6 trees for the basic, intermediate, and advanced units, respectively. This is a reduction of 1 for basic and 2 for intermediate from the original units before their 2023 release, with no change for the advanced unit.</p>

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		solely on performance at assessment (which is restricted to number of trees).	<p>This decision takes into account the desire to have sufficient assessment evidence of learners demonstrating felling techniques to address safety considerations, which needs to be balanced with the ability of training providers to obtain enough trees to deliver the training, so that all those who require training can access it.</p> <p>This decision is also based on a detailed rationale, which is further explained on the project webpage, and complemented by further clarifications and requirements in the units as per suggestions received during the broad consultation processes. Additionally, the draft Companion Volume User Guide has been created and updated with additional recommendations.</p>

8 Future Project Proposals for Consideration

Organisation Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
State Training Authority	Victoria	<ul style="list-style-type: none"> Highlighted that the Companion Volume User Guide leaves RTOs with the responsibility of determining learners' suitability to undertake the basic tree felling unit without a recognised pre-requisite to support their assessment; Suggested that during the next review, stakeholders should explicitly define the unique skills required at each competency level and possibly re-write the units to accurately reflect these in their content. 	<p>Noted, thank you. Your suggestion has been acknowledged.</p> <p>In light of this recommendation for a more effective resolution of issues related to the allocation of prerequisite units, and considering the stakeholders' support for prerequisite units, it is suggested that the future review of these units focusses on identifying the unique and essential skills required at each level of competency and, possibly, revising the units to accurately encompass these skills in their content. This suggestion has been recorded in the issues register and will be given due consideration during the future review of these units.</p>
Registered Training Organisation	Victoria; Queensland	<ul style="list-style-type: none"> Proposed the need for a more comprehensive discussion and consensus among the various users of these units to clearly differentiate the range of trees and complexity of skills and assessment criteria across different skill levels. They suggested that this be recorded in the issues register for consideration during future reviews of the units. Refer to the last feedback item from Section 5. 	<p>Noted. Thank you. Your suggestion has been acknowledged.</p> <p>This suggestion has been recorded in the issues register and will be given due consideration during the future review of these units.</p>

