

Tree Felling Project

Stakeholder Feedback and Responses Report: Broad Consultation

28 November 2023

In consultation with subject matter experts, three tree felling units were reviewed and updated where applicable to improve deliverability, while also supporting safety and competency. Draft documents containing the proposed changes were available for broad industry review and feedback on the [project webpage](#) from 17 October to 14 November 2023.

This report collates the input received during broad consultation, including the three information sessions, 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 newsletters and news alerts, 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 2015. 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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Feedback via Survey and Email

1 Unit Application – Support and Suggestions for Refining Pre-existing Skill Statement

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	Western Australia	<ul style="list-style-type: none"> Agreed with pre-existing skills statement in Application. 	Noted. Thank you for your response.
Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> Recommended the following wording for the pre-existing skills statement in Application. Basic tree felling - <i>"The learners possess relevant prior skills and knowledge in the startup, shutdown, maintenance and operations of a chainsaw in a trim, and crosscut operations to ensure their safety and duty of care."</i> Intermediate tree felling - <i>"Individuals who seek to undertake this unit MUST have prior experience in felling trees at the Basic Tree Felling level in order to ensure their safety while completing this training and assessment."</i> Advanced tree felling - <i>Individuals who seek to undertake this unit MUST have prior experience in Intermediate Tree Felling in order to ensure their safety while completing this work."</i> 	<p>Adopted. Thank you for your suggestions.</p> <p>The pre-existing skill statement in the Application has been refined following the feedback received provide greater clarity and relevance to each skill level: basic, intermediate, and advanced.</p> <p>This statement now reads as follows for each unit:</p> <p>Fell trees manually (basic): <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> <p>Fell trees manually (intermediate): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down,</i></p>

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			<p><i>maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Fell trees manually (advanced): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely conducting intermediate tree felling operations using a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p>
Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> • Agreed with pre-existing skills statement in Application. 	Noted. Thank you for your support.
Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> • Agreed with pre-existing skills statement in Application. 	Noted. Thank you for your support.
Government Local	New South Wales	<ul style="list-style-type: none"> • Agreed with pre-existing skills statement in Application. 	Noted. Thank you for your support.
Industry Training Advisory Board/Other	Queensland	<ul style="list-style-type: none"> • Agreed with pre-existing skills statement in Application. 	Noted. Thank you for your support.
Enterprise - Government Registered	New South Wales	<ul style="list-style-type: none"> • Agreed with pre-existing skills statement in Application. 	Noted. Thank you for your support.

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Training Organisation (RTO)			
Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Advocated for prerequisite units. 	<p>Noted. Thank you for bringing up the matter regarding prerequisite units.</p> <p>To clarify, the introduction of prerequisite units for tree felling learners emerged as a significant safety measure proposed by industry to ensure learners embark on their training already equipped with essential skills and knowledge to support a safe training and assessment process.</p> <p>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.</p> <p>As an alternative, it was agreed to integrate a statement in the Application sections of both the basic, intermediate and advanced units, emphasising the value of prior experience.</p> <p>This statement reads as follows for each unit, and further explanation is provided in the new User Guide for the tree felling units:</p> <p>Fell trees manually (basic): <i>“Individuals who seek to undertake this unit must have prior skills and knowledge in the safe startup, shutdown,</i></p>

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Registered Training Organisation (RTO)	Tasmania	<ul style="list-style-type: none"> • Advocated for prerequisite units. <p>Quote: <i>"A Chainsaw licence should be MANDATORY as a prerequisite to hold any Tree Falling licence. How can a student safely fall trees without good/proper and safe chainsaw operator skills and techniques.</i></p> <p><i>I believe Intermediate should be a prerequisite on the way to achieving an Advanced Tree Falling competency. As the tree structure and complexity are quite different and safe execution of felling these types of trees should be for the most experienced of</i></p>	<p><i>maintenance, and operations of a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Fell trees manually (intermediate): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down, maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Fell trees manually (advanced): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely conducting intermediate tree felling operations using a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Noted. Thank you for bringing up the matter regarding prerequisite units.</p> <p>To clarify, the introduction of prerequisite units for tree felling learners emerged as a significant safety measure proposed by industry to ensure learners embark on their training already equipped with essential skills and knowledge to support a safe training and assessment process.</p> <p>However, after extensive discussions and a rigorous review of the potential options for prerequisite units,</p>

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		<p><i>fallers hence' Time spent as an Intermediate Faller gaining knowledge and experience in these characteristics.</i></p> <p><i>I constantly have Arborist's applying for Advanced Tree Falling Licences straight up without ever holding an intermediate or even basic licence. And to their credit once I've explained the difference and complexity of the 2 units there understand. But as I've said Intermediate SHOULD BE a prerequisite before Advanced, I understand it isn't, but I will not give Advanced licences before holding an Intermediate first. Keeping with the reports core issues finding Advanced Trees isn't always easy for me but not impossible as TasTafe has great relationships with all the Tasmanian Logging Companies and Contractors."</i></p>	<p>it was determined that none of the available options are compliant with the Training Package Organising Framework.</p> <p>As an alternative, it was agreed to integrate a statement in the Application sections of both the basic, intermediate and advanced units, emphasising the value of prior experience.</p> <p>This statement reads as follows for each unit, and further explanation is provided in the new User Guide for the Tree Felling Units:</p> <p>Fell trees manually (basic): <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> <p>Fell trees manually (intermediate): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down, maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Fell trees manually (advanced): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely conducting intermediate tree</i></p>

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			<i>felling operations using a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i>

2 Assessment Criteria – Supportive of Tree Reduction

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	Western Australia	<ul style="list-style-type: none"> • Agreed with the tree number proposed for assessment in basic and intermediate tree felling. • Agreed with retaining the tree number for assessment in advanced tree felling. <p><i>Quote: "I think the consulting group has come up with a reasonable compromise between number of trees fallen under assessment and being confident that the learner has demonstrated required skills."</i></p>	Noted. Thank you for your support.
Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> • Agreed with the tree number proposed for assessment in basic and intermediate tree felling. • Agreed with retaining the tree number for assessment in advanced tree felling. 	Noted. Thank you for your support.
Industry Training Advisory Board/Other	Queensland	<ul style="list-style-type: none"> • Agreed with the tree number proposed for assessment in basic and intermediate tree felling. <p><i>Quote: "From my experience the cutting skills required is a big step up from the basic level. However, having read [proposed] performance</i></p>	Noted. Thank you for your support.

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<p><i>evidence, 4 trees would be sufficient and happy to accept 4 trees.</i></p> <p><i>I do agree that 3 trees would be sufficient for the basic assessment. I also agree with the comment that the bar length can be unnecessary.</i></p> <p><i>Knowledge of the saw, safety and maintenance are major factors, followed by correct cutting methods are key at the level. So, 3 trees will be sufficient."</i></p>	
Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> • Agreed with the tree number proposed for assessment in intermediate tree felling. 	Noted. Thank you for your support.
Government Local	New South Wales	<ul style="list-style-type: none"> • Agreed with the tree number proposed for assessment in intermediate tree felling. 	Noted. Thank you for your support.
Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Agreed with the tree number proposed for assessment in intermediate tree felling. • Agreed with retaining the tree number for assessment in advanced tree felling. 	Noted. Thank you for your support.
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Agreed with the tree number proposed for assessment in basic intermediate tree felling. <p>Quote: <i>"Appropriate for this level of Tree Felling"</i> (referring to the basic unit)</p>	Noted. Thank you for your support.

3 Assessment Criteria – Unsupportive of Tree Reduction

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Northern Territory	<ul style="list-style-type: none"> Recommended further reduction in the tree number proposed for assessment in basic tree felling. <p>Quote: <i>“Personally I would like to see the tree numbers lowered even further as having specific trees to meet the criteria are difficult to access here in the NT. I would rather do as we do now cut one tree and cut this into usable lengths and stand these in purpose-built stands for people to practice their scarf and release cuts on. This way we minimize the tree numbers cut down. this is particularly important when we are delivering this unit to First Nations People on their country as the needless destruction of trees is culturally inappropriate and we must always be mindful of this. If we have a course of 8 people, it means cutting down 24 assessment trees and others to practice on. It may be better to set the standard of 1 or more assessment trees as appropriate rather than a blanket 3.”</i></p>	<p>Noted. Thank you for providing this feedback.</p> <p>This project aims to facilitate a delivery issue of these units caused by the tree challenge - limited tree availability - while safety is a significant consideration.</p> <p>A critical element for achieving practical outcomes is that the resolution must balance the interests of training providers, both those affected and not affected by the tree challenge, without compromising the quality of assessment and safety.</p> <p>During consultations, stakeholder responses regarding the proposed number of trees for assessment in the tree felling units (3, 4 and 6 trees for the basic, intermediate and advanced unit, respectively) were mixed. While some stakeholders agreed with the proposed numbers, others expressed disagreement. The dissenting group was further divided, with some advocating for a return to the original units of competency before their 2023 release, and others suggesting a further reduction in tree numbers.</p> <p>Following a comprehensive review of all the feedback received, the Subject Matter Experts (SMEs) concluded to retain the number of trees proposed in consultations, specifically 3, 4 and 6 trees for the basic, intermediate, and advanced skill</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			<p>levels, respectively. These numbers represent a reduction of 1 and 2 trees for basic and intermediate levels from the original units before their 2023 release, with no change for the advanced level.</p> <p>This decision is 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 process (these are also explained on the project webpage). Additionally, the new User Guide has been updated with additional recommendations.</p> <p>These improvements aim to collectively ensure that the assessment continues to uphold a high standard of safety and a robust assessment of competency, while providing workable approaches for the constraints from limited tree availability.</p>
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Did not agree with the tree number proposed for assessment in advanced tree felling. Indirectly, recommended further reduction in the tree number proposed for assessment in advanced tree felling. <p>Quote: <i>"I realise that felling an advance tree is extremely dangerous and requires a higher skill level however it is getting extremely difficult to locate areas where trees with certain attributes that can be felled can be found including:</i></p> <p><i>Heavy forward lean.</i></p> <p><i>Multi-legged, hollow butts, culls and stags.</i></p>	<p>Noted. Thank you for providing this feedback.</p> <p>This project aims to facilitate a delivery issue of these units caused by the tree challenge - limited tree availability - while safety is a significant consideration.</p> <p>A critical element for achieving practical outcomes is that the resolution must balance the interests of training providers, both those affected and not affected by the tree challenge, without compromising the quality of assessment and safety.</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<p><i>Complex multi-stems.</i></p> <p><i>Damage or defect that requires complex felling techniques, including trees with visible lightning damage,</i></p> <p><i>Burnt out trees.</i></p> <p><i>Fire damaged butts.”</i></p>	<p>During consultations, stakeholder responses regarding the proposed number of trees for assessment in the tree felling units (3, 4 and 6 trees for the basic, intermediate and advanced unit, respectively) were mixed. While some stakeholders agreed with the proposed numbers, others expressed disagreement. The dissenting group was further divided, with some advocating for a return to the original units of competency before their 2023 release, and others suggesting a further reduction in tree numbers.</p> <p>Following a comprehensive review of all the feedback received, the Subject Matter Experts (SMEs) concluded to retain the number of trees proposed in consultations, specifically 3, 4 and 6 trees for the basic, intermediate, and advanced skill levels, respectively. These numbers represent a reduction of 1 and 2 trees for basic and intermediate levels from the original units before their 2023 release, with no change for the advanced level.</p> <p>This decision is 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 process (these are also explained on the project webpage). Additionally, the new User Guide has been updated with additional recommendations.</p>

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Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> Recommended a reduction in the tree number for assessment in advanced tree felling. <p><i>Quote: "At this level it should be clear that the skill level and knowledge should be maintained through continued practical application. As with Intermediate I believe 4 assessment trees would be appropriate - provided that all aspects of difficulty can be covered. With the continued pressure on resources - trees in general for all categories of assessment may be difficult to source in some locations. This should not compromise the requirement for safety and assessment/competence."</i></p>	<p>These improvements aim to collectively ensure that the assessment continues to uphold a high standard of safety and a robust assessment of competency, while providing workable approaches for the constraints from limited tree availability.</p> <p>Noted. Thank you for providing this feedback.</p> <p>This project aims to facilitate a delivery issue of these units caused by the tree challenge - limited tree availability - while safety is a significant consideration.</p> <p>A critical element for achieving practical outcomes is that the resolution must balance the interests of training providers, both those affected and not affected by the tree challenge, without compromising the quality of assessment and safety.</p> <p>During consultations, stakeholder responses regarding the proposed number of trees for assessment in the tree felling units (3, 4 and 6 trees for the basic, intermediate and advanced unit, respectively) were mixed. While some stakeholders agreed with the proposed numbers, others expressed disagreement. The dissenting group was further divided, with some advocating for a return to the original units of competency before their 2023 release, and others suggesting a further reduction in tree numbers.</p> <p>Following a comprehensive review of all the feedback received, the Subject Matter Experts</p>

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			<p>(SMEs) concluded to retain the number of trees proposed in consultations, specifically 3, 4 and 6 trees for the basic, intermediate, and advanced skill levels, respectively. These numbers represent a reduction of 1 and 2 trees for basic and intermediate levels from the original units before their 2023 release, with no change for the advanced level.</p> <p>This decision is 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 process (these are also explained on the project webpage). Additionally, the new User Guide has been updated with additional recommendations.</p> <p>These improvements aim to collectively ensure that the assessment continues to uphold a high standard of safety and a robust assessment of competency, while providing workable approaches for the constraints from limited tree availability.</p>
Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Did not agree with the reduction from 4 to 3 trees for assessment in the basic tree felling. <p>Quote: <i>"I believe the unit should be 4 minimum. If assessed correctly most would be deemed NYC in any less. If you don't have 4 for assessment, what are these organisations training their students on? I have just completed reassessments on students that were deem competent on 2 trees in one day, less than 1 month ago, they had trouble starting the saw, went</i></p>	<p>Noted. Thank you for providing this feedback.</p> <p>This project aims to facilitate a delivery issue of these units caused by the tree challenge - limited tree availability - while safety is a significant consideration.</p> <p>A critical element for achieving practical outcomes is that the resolution must balance the interests of training providers, both those affected and not</p>

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		<p><i>back to their place of work and told their boss they were not competent. They were correct."</i></p>	<p>affected by the tree challenge, without compromising the quality of assessment and safety.</p> <p>During consultations, stakeholder responses regarding the proposed number of trees for assessment in the tree felling units (3, 4 and 6 trees for the basic, intermediate and advanced unit, respectively) were mixed. While some stakeholders agreed with the proposed numbers, others expressed disagreement. The dissenting group was further divided, with some advocating for a return to the original units of competency before their 2023 release, and others suggesting a further reduction in tree numbers.</p> <p>Following a comprehensive review of all the feedback received, the Subject Matter Experts (SMEs) concluded to retain the number of trees proposed in consultations, specifically 3, 4 and 6 trees for the basic, intermediate, and advanced skill levels, respectively. These numbers represent a reduction of 1 and 2 trees for basic and intermediate levels from the original units before their 2023 release, with no change for the advanced level.</p> <p>This decision is 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 process (these are also explained on the project webpage).</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Tasmania	<ul style="list-style-type: none"> • Did not agree with the reduction in the tree number proposed for assessment in basic tree felling. <p>Quote: <i>"I am sympathetic to the states that struggle with finding tree numbers to fulfill assessment requirements, but I don't believe it should be reduced. Simulated logs and limbs might be good practice but would not simulate real standing tree reaction to compression and tension and the unpredictably nature that some tree species present."</i></p>	<p>Additionally, the new User Guide has been updated with additional recommendations.</p> <p>These improvements aim to collectively ensure that the assessment continues to uphold a high standard of safety and a robust assessment of competency, while providing workable approaches for the constraints from limited tree availability.</p> <hr/> <p>Noted. Thank you for providing this feedback.</p> <p>This project aims to facilitate a delivery issue of these units caused by the tree challenge - limited tree availability - while safety is a significant consideration.</p> <p>A critical element for achieving practical outcomes is that the resolution must balance the interests of training providers, both those affected and not affected by the tree challenge, without compromising the quality of assessment and safety.</p> <p>During consultations, stakeholder responses regarding the proposed number of trees for assessment in the tree felling units (3, 4 and 6 trees for the basic, intermediate and advanced unit, respectively) were mixed. While some stakeholders agreed with the proposed numbers, others expressed disagreement. The dissenting group was further divided, with some advocating for a return to the original units of competency before their 2023 release, and others suggesting a further reduction in tree numbers.</p>

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			<p>Following a comprehensive review of all the feedback received, the Subject Matter Experts (SMEs) concluded to retain the number of trees proposed in consultations, specifically 3, 4 and 6 trees for the basic, intermediate, and advanced skill levels, respectively. These numbers represent a reduction of 1 and 2 trees for basic and intermediate levels from the original units before their 2023 release, with no change for the advanced level.</p> <p>This decision is 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 process (these are also explained on the project webpage). Additionally, the new User Guide has been updated with additional recommendations.</p> <p>These improvements aim to collectively ensure that the assessment continues to uphold a high standard of safety and a robust assessment of competency, while providing workable approaches for the constraints from limited tree availability.</p>

4 Assessment Criteria – Supportive of Chainsaw Bar Length Specifications

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	Western Australia	<ul style="list-style-type: none"> • Agreed with chainsaw bar length specifications for assessment in basic tree felling • Recommended 25 inch or 63 cm for the chainsaw bar length in intermediate tree felling as this is the standard length for a bar. 	<p>Noted. Thank you for support.</p> <p>After reviewing all feedback received, some of which questioned the usefulness of these details, the SMEs have removed the prescriptive specifications for chainsaw bar length from the Performance Evidence. It now refers to using <i>“a chainsaw with a bar length appropriate to the tree's diameter”</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p>
Registered Training Organisation (RTO)	Northern Territory	<ul style="list-style-type: none"> • Agreed with chainsaw bar length specifications in assessment criteria and pre-existing skills statement in Application. 	<p>Noted. Thank you for support.</p> <p>After reviewing all feedback received, some of which questioned the usefulness of these details, the SMEs have removed the prescriptive specifications for chainsaw bar length from the Performance Evidence. It now refers to using <i>“a</i></p>

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Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> Agreed with chainsaw bar length specifications for assessment in basic tree felling. 	<p><i>chainsaw with a bar length appropriate to the tree's diameter</i>".</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p> <hr/> <p>Noted. Thank you for support.</p> <p>After reviewing all feedback received, some of which questioned the usefulness of these details, the SMEs have removed the prescriptive specifications for chainsaw bar length from the Performance Evidence. It now refers to using <i>"a chainsaw with a bar length appropriate to the tree's diameter"</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to</p>

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Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> • Agreed with specifications on tree diameter relative to chainsaw bar length and chainsaw bar length for assessment in intermediate tree felling. 	<p>predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p> <p>Noted. Thank you for support.</p> <p>After reviewing all feedback received, some of which questioned the usefulness of these details, the SMEs have removed the prescriptive specifications for chainsaw bar length from the Performance Evidence. It now refers to using <i>“a chainsaw with a bar length appropriate to the tree’s diameter”</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p>
Government Local	New South Wales	<ul style="list-style-type: none"> • Agreed with specifications on tree diameter relative to chainsaw bar length and chainsaw bar length for assessment in intermediate tree felling. 	<p>Noted. Thank you for support.</p> <p>After reviewing all feedback received, some of which questioned the usefulness of these details,</p>

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Industry Training Advisory Board/Other	Queensland	<ul style="list-style-type: none"> • Agreed with specifications on tree diameter relative to chainsaw bar length and chainsaw bar length for assessment in intermediate tree felling. 	<p>the SMEs have removed the prescriptive specifications for chainsaw bar length from the Performance Evidence. It now refers to using <i>“a chainsaw with a bar length appropriate to the tree's diameter”</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p> <hr/> <p>Noted. Thank you for support.</p> <p>After reviewing all feedback received, some of which questioned the usefulness of these details, the SMEs have removed the prescriptive specifications for chainsaw bar length from the Performance Evidence. It now refers to using <i>“a chainsaw with a bar length appropriate to the tree's diameter”</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and</p>

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Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Agreed with specifications on tree diameter relative to chainsaw bar length and chainsaw bar length for assessment in intermediate tree felling. 	<p>selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p> <p>Noted. Thank you for support.</p> <p>After reviewing all feedback received, some of which questioned the usefulness of these details, the SMEs have removed the prescriptive specifications for chainsaw bar length from the Performance Evidence. It now refers to using <i>“a chainsaw with a bar length appropriate to the tree's diameter”</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p>

5 Assessment Criteria – Unsupportive of Chainsaw Bar Length Specifications

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> • Did not agree with chainsaw bar length specifications for assessment in basic and intermediate tree felling. <p>Quote: <i>"I do not see the purpose of this in the standards. I fail to see what this is to achieve and the relevance of it. The application statement covers what is required without the need to include a chainsaw bar size."</i></p>	<p>Adopted. Thank you for providing your feedback.</p> <p>The specific requirements for chainsaw bar length have been removed from the Performance Evidence. It now refers to using <i>"a chainsaw with a bar length appropriate to the tree's diameter"</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p>
Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Did not agree with chainsaw bar length specifications for assessment in basic and intermediate tree felling. <p>Quote: <i>"So we are saying a smaller tree can't be an intermediate, no need for minimum size bar."</i></p> <p><i>"If this is put in, I would just suggest that it is a maximum of 20 inch [for the basic]. Just my thought no need for minimum."</i></p>	<p>Adopted. Thank you for providing your feedback.</p> <p>The specific requirements for chainsaw bar length have been removed from the Performance Evidence. It now refers to using <i>"a chainsaw with a bar length appropriate to the tree's diameter"</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Tasmania	<ul style="list-style-type: none"> • Did not agree with chainsaw bar length specifications for assessment in basic and intermediate tree felling. <p><i>Quote: "Chainsaw bar lengths for certain size trees seems pointless! If a student presents for any sort of Tree Falling assessment, they shouldn't have restraint on their choice of bar length it could be time consuming and expensive. I'm sorry it makes no sense to me. Experienced Trainers or Tree Fallers would not take any tree with insufficient tools and should not be under any restraint of mandatory rules on bar lengths. Taller students might prefer longer bar lengths to assist in manual handling and pressure on their backs."</i></p>	<p>selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p> <hr/> <p>Adopted. Thank you for providing your feedback.</p> <p>The specific requirements for chainsaw bar length have been removed from the Performance Evidence. It now refers to using "a chainsaw with a bar length appropriate to the tree's diameter".</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p>

6 Assessment Criteria – Suggestions for Adding Three Categories in Advanced Tree Felling

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<p>Recommended assessment criteria for tree categories in advanced tree felling as follows:</p> <p>Quote: <i>“Is there a possibility of the assessment having a cross section of advanced trees maybe fell two of each category. This will give the leaner a larger skill base rather than just felling 6 forward leaning trees and being competent.”</i></p>	<p>Adopted. Thank you for providing these suggestions.</p> <p>We have added new criteria in the Performance Evidence for selecting tree types to demonstrate skill at the advanced level.</p> <p>This reads as follows:</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>trees with a lean and a weight distribution that adds significant complexity, yet can be assessed and adapted to site requirements</i> • <i>trees 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 with a large diameter that can be safely felled using complex felling techniques</i> • <i>at least two trees exhibiting damage or defect that requires complex felling techniques, to be selected from, but not limited to, the following list:</i> <ul style="list-style-type: none"> • <i>trees with visible lightning damage</i> • <i>trees that are burnt out or have fire-damaged butts</i> • <i>trees with multi-legged, hollow butts, culls and stags</i> • <i>trees with complex multi-stems.”</i>

7 Draft User Guide

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Industry Training Advisory Board/Other	Victoria	<p>Quote: <i>"The advice states that 'Training providers are advised to implement the following structured sequence for unit enrolment or entry requirements, ensuring individuals meet the foundational skills that are essential for each skill level.'</i></p> <p><i>The rationale for not using formal pre-requisites has been explained. However avoiding the term 'pre-requisite' has led to an inconsistent use of training package product language - the term 'entry requirements' is used for qualifications and units have pre-requisites. Also the term 'foundational skills' is a similar term to Foundation Skills included in each unit. This has the potential to create confusion in interpretation.</i></p> <p><i>The table heading of column 2 recommends entry requirements (which are really prerequisites) but it is not clear if this is referring to the recommended structured sequence or both. Suggest review for intent."</i></p>	<p>Adopted. Thank you for providing this feedback.</p> <p>The paragraph and table from Section 2 of the new User Guide, focusing on pre-existing skills and knowledge recommendations have been revised to address the concerns outlined. They now read as follows:</p> <p><i>"The industry not only strongly recommends but expects that individuals enrolling in any of the tree felling units have pre-existing skills and knowledge of chainsaw operation specific to tree felling and associated risk level. This ensures they approach the training with the requisite safety awareness and competence necessary for each skill level: basic, intermediate and advanced. Training providers are advised to implement the structured sequence of skills and knowledge outlined in Table 1, verifying prospective students' completion of the respective course before allowing enrolment in tree felling units.</i></p> <p><i>Table 1: Sequence of Recommended Skills and Knowledge Verification for Prospective Tree Felling Students"</i></p>
Industry Training	Victoria	<p>Quote: <i>"The paragraph under the table states that 'If an individual possesses an equivalent level of knowledge and skills gained through informal learning or coaching, a preliminary test (administered</i></p>	<p>Adopted. Thank you for providing this feedback.</p> <p>The paragraph in question from Section 2 of the new User Guide, focusing on pre-existing skills and</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Advisory Board/Other		<p><i>within the available course delivery hours) could be used at the course's commencement to determine this equivalence.' Question - an equivalent level of skills and knowledge to what? The units that are included in column 2 of the table? Suggest this advice be reviewed for intent. Some further points.</i></p> <p><i>Determining equivalence in terms of skills and knowledge for units is done through the RPL/RCC process with recognition given for the unit. It would be done prior to enrolment in the tree felling unit via the RPL/RCC process with formal recognition given to the student for that RPL/RCC'd unit within the course (assuming that the term 'course' is referring to an enrolment in a qualification and not stand-alone unit or short course).</i></p> <p><i>Implementing the recommendation of a preliminary test at the commencement of the 'course' to determine equivalence within the 'course' (or should that be unit?) within the available course (unit?) delivery hours may be problematic. The preliminary test is only for the unit rather than a qualification containing the unit. The problem is that, taking hours for a test reduces the available nominal hours for delivering the unit (nominal hours are for delivery and assessment of the tree felling unit are already set for each state and not likely to change for superseding equivalent units). Also, if there is no formal RPL/RCC process, how would the equivalent skills and knowledge be recognised by the RTO? The RTO would need to enrol the student in the tree felling</i></p>	<p>knowledge recommendations have been revised to address the concerns outlined. It now reads as follows:</p> <p><i>"If an individual has acquired knowledge and skills corresponding to those listed in Table 1 through informal learning or coaching, they could undertake a Recognition of Prior Learning (RPL) or Recognition of Current Competency (RCC) process. This can be done either within the enrolment in a qualification or before enrolling in the tree felling unit, to assess the equivalency of their skill level."</i></p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<p>unit before determining their skill level. What happens if they don't have the level of skills and knowledge - are they withdrawn, and if withdrawn there be future subsidised funding issues for that student in that unit?"</p>	

8 Clarifications Requested

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Queensland	<p>Required clarifications on the following:</p> <ul style="list-style-type: none"> • Does having 'prior experience' mean having completed 'Fall trees manually (basic)' or similar, or just some experience felling trees? • What is the definition of an 'intermediate' tree. How is 'intermediate' quantified? • Please define the difference between a 90 degree scarf and a V scarf. If it is defined by the angle of the cuts used, why not define it as an 'open-face' scarf (the term used commonly in the industry and training manuals to describe this type of scarf) and define the angle limits being up to a total of 90 degrees? 	<p>Noted. Thank you for these questions. We would like to provide the following clarifications:</p> <ul style="list-style-type: none"> • The prior skills statement in the Application is a recommendation, not a mandatory requirement. It has been amended for providing more clarity, and it now refers to "<i>prior skills and knowledge</i>", not experience. Further explanations about this recommendation are available in the new User Guide for the tree felling units. • The definition of a basic, intermediate or advanced tree is outlined in the Application of each unit. The paragraph begins with, "<i>Trees typical to the scope of this unit may have some of the following characteristics</i>", being followed by a set of bullet points. • The different types of scarf techniques are clearly explained in the "Tree Faller's Manual" at pages 25-

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			29. The Tree Faller's Manual is an essential handbook for forest operators and others who need to fell trees manually using a hand-held chainsaw. The manual covers the tree felling units of competency.
Enterprise - Government Registered Training Organisation (RTO)	NSW	Quote: <i>"Intermediate level application indicates there should be limited or no lean on Intermediate assessment trees? There has to be a practical assessment and allow some acceptable lean for skill level."</i>	Noted. Thank you for your query. We would like to clarify that the definition of an intermediate tree, which is outlined in the Application, says that a tree with intermediate characteristics may have <i>"forward lean, backward lean or side lean"</i> , amongst a list of other features. No section of this unit indicates that a intermediate tree should have limited or no lean.

9 General Comment

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Industry Training Advisory Board/Other	Queensland	Quote: <i>"In Queensland the Best Practice Review of Workplace Health and Safety Queensland (WHSQ) considered the high risk work (HRW) licensing and accreditation framework including the role of registered training organisations (RTOs) in training and assessing applicants. During the review stakeholders raised specific concerns about the quality of training, including course length, limited practical hours during training, RTOs teaching to the</i>	Noted. Thank you for your comment.

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	New South Wales	<p><i>assessment material instead of covering the breadth of material set for the relevant unit of competency, and limited audit activity and intervention by the national VET sector regulator, the Australian Skills Quality Authority (ASQA)."</i></p> <p>Quote: <i>"I believe there is too many restrictions in the type of trees when the whole reason for changing was we didn't have enough trees."</i></p>	<p>Noted. Thank you for your comment.</p> <p>It is important to consider both the context and objectives of high quality training and assessment, while also acknowledging the constraints posed by the limited availability of trees. In addition, it is critical to address concerns about the observed inadequacies in current training and assessment practices, particularly the prevalent 'tick and flick' approach.</p> <p>With the proposed modification, which involves a slight reduction in the number of trees used for assessment – especially in the intermediate unit – the primary objective of quality skills and safety remains unchanged. Consultations have emphasised the importance of ensuring that trainees demonstrate skills across a diverse range of tree types to allow for a broader skill set that is adaptable and applicable to different real-world scenarios. Allowing assessments on only one type of tree would markedly restrict the breadth of skills and knowledge that trainees can acquire.</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Peak Industry Body	National	<p>Quote: <i>“There are a number of underlying issues that will have impact upon skill levels and safety of personnel undertaking these tasks.</i></p> <p><i>It appears that the desire to meet the timber supply outweighs the need for safe operations.</i></p> <p><i>Already in we Australia are seeing multiple RTOs that already don’t meet any level of real skill development, but they are allowed to prosper because trainees and employers do not appreciate the high risk nature of this task. Those of us who have worked for a long time in training and safety in the Forest Industry have seen the multiple fatalities and horrific injuries that were commonplace with tree fellers both experienced and beginners.</i></p> <p><i>While outside the project, the main concern is how much training on real trees is going to occur when many see the assessment trees and practice as the same thing. So reducing trees will be seen as the number of trees required. The number of assessment trees is not a major problem if training trees are being utilised. I fear this will not be the case.</i></p> <p><i>I urge the committee to ensure that Basic falling remains robust, there is a trend of going directly to intermediate rather than getting a background at the lower level. This was the intent of the original competencies. Intermediate by its very nature also needs to be robust but many RTOS and clients are</i></p>	<p>Noted. Thank you for your comment.</p> <p>The outcomes resulting from this project are 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 process. Additionally, a new User Guide has been developed and updated with additional recommendations.</p> <p>These improvements collectively ensure that the assessment continues to uphold a high standard of safety and a robust assessment of competency, while providing workable approaches for the constraints from limited tree availability.</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<p><i>more interested in a cheap solution not skilled and safer workers.</i></p> <p><i>It appears that one of the main drivers of this process is the Arb Sector and what it requires, I appreciate that there is a tree shortage in this sector due to the very nature of their core tasks. This is compounded by the inclusion of the Intermediate as a compulsory unit in their Cert III qualification. I think this should be reconsidered in the ARB package as they are taking a unit developed for forest application into another environment where mechanical assistance is the norm not the exception. Dismantling tree or mechanically assisted tree felling units would be more relevant.</i></p> <p><i>I would also suggest that in the current environment of tree preservation and a push for mechanical tree felling in fire environments, large trees are not being felled except in exceptional circumstances. Also it must be remembered that advanced trees by criteria may not necessarily large."</i></p>	

Feedback via Information Sessions

10 Unit Application – Suggestions for Refining Pre-existing Skill Statement

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Peak Industry Body	National	<ul style="list-style-type: none"> Supported the concept and intent of the statement but expressed concerns that the language used may be misleading upon initial reading, particularly in relation to the basic level. It should eliminate the reference to felling. 	<p>Adopted. Thank you for your comments.</p> <p>The pre-existing skill statement in the Application has been refined following the feedback received provide greater clarity and relevance to each skill level: basic, intermediate, and advanced.</p> <p>This statement now reads as follows for each unit:</p> <p>Fell trees manually (basic): <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> <p>Fell trees manually (intermediate): <i>“Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down, maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care.”</i></p> <p>Fell trees manually (advanced): <i>“Individuals who seek to undertake this unit must have prior skills and</i></p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Victoria	<ul style="list-style-type: none"> Supported the other participants' suggestions regarding the pre-existing skill statement in the Application and proposed the inclusion of "safe cutting techniques" in the criteria to emphasise the importance of safe chainsaw operation. 	<p><i>knowledge in safely conducting intermediate tree felling operations using a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Adopted. Thank you for your comments.</p> <p>The pre-existing skill statement in the Application has been refined following the feedback received provide greater clarity and relevance to each skill level: basic, intermediate, and advanced.</p> <p>This statement now reads as follows for each unit:</p> <p>Fell trees manually (basic): <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> <p>Fell trees manually (intermediate): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down, maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Fell trees manually (advanced): <i>Individuals who seek to undertake this unit must have prior skills and knowledge in safely conducting intermediate tree</i></p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Government Local	New South Wales	<ul style="list-style-type: none"> • Concurred with the other participant's concerns about the potential for misinterpretation of the wording in the Application. • Suggested the removal of the phrase <i>"for the purpose of felling trees"</i> from the statement. Argued that the phrase is unnecessary as the actual intent is to ensure that applicants have basic chainsaw operating experience, which could include simple tasks like cross-cutting, not necessarily experience with felling trees. 	<p><i>felling operations using a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Adopted. Thank you for your comments.</p> <p>The pre-existing skill statement in the Application has been refined following the feedback received provide greater clarity and relevance to each skill level: basic, intermediate, and advanced.</p> <p>This statement now reads as follows for each unit:</p> <p>Fell trees manually (basic): <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> <p>Fell trees manually (intermediate): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down, maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Fell trees manually (advanced): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely conducting intermediate tree</i></p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> Concurred with the concerns raised about the pre-existing skill wording in the Application and suggested that more precise language should be used to describe the necessary experience with a chainsaw. Emphasised the need to specify skills in the handling, use, and maintenance of a chainsaw, indicating that an applicant should either possess a certificate or be able to demonstrate experience. 	<p><i>felling operations using a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Adopted. Thank you for your comments.</p> <p>The pre-existing skill statement in the Application has been refined following the feedback received provide greater clarity and relevance to each skill level: basic, intermediate, and advanced.</p> <p>This statement now reads as follows for each unit:</p> <p>Fell trees manually (basic): <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> <p>Fell trees manually (intermediate): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down, maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Fell trees manually (advanced): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely conducting intermediate tree felling operations using a chainsaw to ensure their</i></p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Tasmania	<ul style="list-style-type: none"> Commented on the choice of wording in the statement, suggesting a change from <i>"should have prior experience"</i> to <i>"must have prior experience"</i>. Indicated that <i>"should"</i> is too weak and implies a recommendation rather than a requirement, which is unsatisfactory. 	<p><i>own safety and uphold the training provider's duty of care."</i></p> <p>Adopted. Thank you for your comments.</p> <p>The pre-existing skill statement in the Application has been refined following the feedback received provide greater clarity and relevance to each skill level: basic, intermediate, and advanced.</p> <p>This statement now reads as follows for each unit:</p> <p>Fell trees manually (basic): <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> <p>Fell trees manually (intermediate): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down, maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Fell trees manually (advanced): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely conducting intermediate tree felling operations using a chainsaw to ensure their</i></p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			<i>own safety and uphold the training provider's duty of care."</i>

11 Assessment Criteria – Querying about Chainsaw Bar Length Specifications

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Indicated that selecting trees to fell based on equipment specifications is impractical. Stated that 20-inch bars are used across all their tree felling courses. • Added that measuring a tree's diameter at breast height is also impractical, especially on uneven/steep terrain. 	<p>Adopted. Thank you for providing these comments.</p> <p>After reviewing the feedback received, SMEs have agreed to remove the specific requirements for chainsaw bar length from the Performance Evidence. The revised text now specifies using <i>"a chainsaw with a bar length suitable for the tree's diameter"</i>. Additionally, the term <i>"diameter at breast height"</i> has been replaced with <i>"a diameter measured at 1.3 meters from the ground"</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Victoria	<ul style="list-style-type: none"> • Questioned the utility and practicality of strict criteria on equipment specifications, such as chainsaw bar lengths, particularly in the context of fewer tree resources. Imposing rigid specifications on the type of equipment used does not align with real-world scenarios. Advocated for training that equips trainees with skills to assess the situation/challenges they encounter in the field and choose their equipment accordingly. The key lies in the operator's ability to accurately assess the situation and act accordingly. Noted that 20-inch bars are generally the minimum used in their training camp, a practice confirmed by another participant • Cautioned that categorising tree sizes – i.e., 50 centimetres for basic level, 80 centimetres for intermediate level, and so forth – as a guideline can be misleading. Cited instances where 50-centimeter trees required advanced-level techniques. Advocated for a focus on situational assessment and the application of appropriate techniques. • Emphasised that measurements of tree diameter at chest height are not reflective of fieldwork realities. Stated that the natural felling height is closer to hip level. 	<p>preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p> <p>Adopted. Thank you for providing these comments.</p> <p>After reviewing the feedback received, SMEs have agreed to remove the specific requirements for chainsaw bar length from the Performance Evidence. The revised text now specifies using <i>"a chainsaw with a bar length suitable for the tree's diameter"</i>. Additionally, the term <i>"diameter at breast height"</i> has been replaced with <i>"a diameter measured at 1.3 meters from the ground"</i>.</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Peak Industry Body	National	<ul style="list-style-type: none"> Expressed confusion about the relevance of chainsaw bar length in the assessment process for tree felling and requested guidance on the rationale behind these equipment specifications - could not see the connection between bar size and the assessment of skills and performance. Suggested that, using appropriate techniques, a 20-inch bar could be used to fell a tree with a much larger diameter, potentially up to 50 inches. The bar length specifications do not accurately restrict the tree size that can be handled, indicating that even with a 13-inch bar, one can manage a substantially large tree. Questioned the practicality and relevance of these specifications, noting that similar discussions were held in the past, and it seems redundant to revisit these issues now. <p>Noted that defining what constitutes a 'basic' tree size is challenging. Recalled past debates about setting a standard at 50 centimetres but pointed out that even this measure can vary significantly depending on the tree's context, such as regrowth conditions.</p> <ul style="list-style-type: none"> Additionally, challenged the requirement for using two different bar sizes in intermediate assessments, suggesting that best practices allow for a single, appropriately sized bar to handle a range of tree sizes. 	<p>Adopted. Thank you for providing these comments.</p> <p>After reviewing the feedback received, SMEs have agreed to remove the specific requirements for chainsaw bar length from the Performance Evidence. The revised text now specifies using "a chainsaw with a bar length suitable for the tree's diameter".</p> <p>This revision recognises the significance of training that equips operators to handle a variety of real-world scenarios, focussing on the development of skills necessary for evaluating situations and selecting appropriate equipment based on the specific environmental conditions and the demands of the task, rather than rigidly adhering to predefined equipment criteria. It also acknowledges the need for flexibility in equipment choice to accommodate individual physical requirements and preferences, particularly in relation to ergonomic factors, such as minimising back strain.</p>

12 Assessment Criteria – Querying about the Need for Assessing Two Scarf Techniques in Intermediate Tree Felling

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Peak Industry Body	National	<ul style="list-style-type: none"> Questioned the necessity of assessing in two different scarf techniques for the intermediate tree felling. Argued that most trees in Australia are likely felled using a standard scarf cut, specifically referencing the Humboldt scarf technique. <p>Suggested that other methods such as the V scarf and the 90-degree scarf are not generally necessary or rooted in practical relevance or necessity. Insisting on two different scarf cuts for the sake of assessment may not be practically relevant.</p>	<p>Noted. Thank you for providing these comments.</p> <p>After reviewing the feedback received, SMEs have agreed to retain the requirement for conducting assessments on two distinct scarfing techniques. This decision acknowledges that an intermediate tree can be quite large, and that trainees need to possess a comprehensive depth of skills and knowledge at this level.</p>

13 Assessment Criteria – Suggestions for Adding Wedge Use in Basic Tree Felling

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Peak Industry Body	National	<ul style="list-style-type: none"> Noted that while the specifications for scarf cuts and back cuts are delineated and adhere to established standards, there is a significant omission in the basic requirements: wedging. Underscored that wedging is fundamental for the safe and controlled felling of trees, arguing that its absence in the criteria implies a limitation to felling only forward-leaning trees, which can be felled without wedges. Pointed out that this is not reflective of real-world conditions where trees, such as those in pine plantations, require the use of wedges to ensure they fall safely and in the correct direction. 	<p>Adopted. Thank you for providing this suggestion.</p> <p>A new criterion has been introduced in the Performance Evidence of the basic unit, requiring the demonstration, at least once, of using the wedge technique in tree felling to safely manage the direction of a tree's fall.</p>
Registered Training Organisation (RTO)	Queensland	<ul style="list-style-type: none"> Stressed the point previously raised that no tree can be assumed to fall in a desired direction without assistance, highlighting the need for including tools such as wedges in the assessment criteria to manage the direction of a tree's fall safely. 	<p>Adopted. Thank you for providing this suggestion.</p> <p>A new criterion has been introduced in the Performance Evidence of the basic unit, requiring the demonstration, at least once, of using the wedge technique in tree felling to safely manage the direction of a tree's fall.</p>

14 Assessment Criteria – Suggestions for Adding Three Categories in Advanced Tree Felling

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> Recommended and emphasised the importance of incorporating examples of advanced tree types within the Performance Evidence criteria for the advanced unit. Noted that not all trees offer the same level of difficulty when being felled, potentially creating gaps in assessment. Without such criteria, there is a risk of an easier path to certification that may not fully equip individuals for the challenges they face in real world. Illustrated this by pointing out that, for example, assessments based exclusively on felling six forward-leaning trees do not evaluate the necessary skills for more complex situations, such as trees leaning against other structures, or those that have been damaged by fire. Specific examples to consider were trees with burned-out bases or those showing significant fire-related damage, as well as trees leaning against other structures. <p>Suggested the following tree characteristics groups and tree numbers for assessment:</p> <p>1 tree from Group A:</p> <ul style="list-style-type: none"> Trees with lean and with weight distribution that adds significant complexity yet can be assessed and adapted to site requirements. Trees with lean in a direction away from the fall zone or side-leaning to the available fall zone. <p>1 tree from Group B</p>	<p>Adopted. Thank you for providing these suggestions.</p> <p>We have added new criteria in the Performance Evidence for selecting tree types to demonstrate skill at the advanced level.</p> <p>This reads as follows:</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>trees with a lean and a weight distribution that adds significant complexity, yet can be assessed and adapted to site requirements</i> <i>trees 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 with a large diameter that can be safely felled using complex felling techniques</i> <i>at least two trees exhibiting damage or defect that requires complex felling techniques, to be selected from, but not limited to, the following list:</i> <ul style="list-style-type: none"> <i>trees with visible lightning damage</i> <i>trees that are burnt out or have fire-damaged butts</i> <i>trees with multi-legged, hollow butts, culls and stags</i>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<ul style="list-style-type: none"> • Trees with a heavy forward lean 2 trees from Group C • Trees with large diameter, but not exclusively, that can be safely felled with complex felling techniques. 2 trees from Group D • Trees with damage or defect that requires complex felling techniques, including: <ul style="list-style-type: none"> • Trees with visible lightning damage, • Burnt out trees and those with fire damaged butts. • Trees with multi-legged, hollow butts, culls and stags. • Trees with complex multi-stems. 	<ul style="list-style-type: none"> • <i>trees with complex multi-stems."</i>
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Agreed with the need for including a range of tree characteristics within the Performance Evidence to encompass the complexities encountered at an advanced level. It is essential that learners demonstrate competence in managing various complex tree types. 	<p>Adopted. Thank you for providing these suggestions.</p> <p>We have added new criteria in the Performance Evidence for selecting tree types to demonstrate skill at the advanced level.</p> <p>This reads as follows:</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>trees with a lean and a weight distribution that adds significant complexity, yet can be assessed and adapted to site requirements</i> • <i>trees 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>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			<ul style="list-style-type: none"> • <i>at least one tree with a large diameter that can be safely felled using complex felling techniques</i> • <i>at least two trees exhibiting damage or defect that requires complex felling techniques, to be selected from, but not limited to, the following list:</i> <ul style="list-style-type: none"> • <i>trees with visible lightning damage</i> • <i>trees that are burnt out or have fire-damaged butts</i> • <i>trees with multi-legged, hollow butts, culls and stags</i> • <i>trees with complex multi-stems.”.</i>

15 Assessment Criteria – Supportive of Tree Reduction

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Other JSCs	National	The national Fire and Emergency organisations have expressed that they are in support of the reduction of trees to be fell within the basic and intermediate units.	Noted. Thank you for support.

16 Assessment Criteria – Unsupportive of Tree Reduction

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Voiced concerns that reducing the number of trees will lower assessment standards. Also highlighted potential safety risks, noting that assessors will certify individuals based on limited assessment evidence. • Emphasised that resource limitations should not compromise the quality of assessment, stating that tree accessibility challenge has existed for decades and clients seeking qualifications are willing in identifying and providing trees. • Noted that their college will continue using the original number of trees and enforcing prerequisites. 	<p>Noted. Thank you for providing this feedback.</p> <p>This project aims to facilitate a delivery issue of these units caused by the tree challenge - limited tree availability - while safety is a significant consideration.</p> <p>A critical element for achieving practical outcomes is that the resolution must balance the interests of training providers, both those affected and not affected by the tree challenge, without compromising the quality of assessment and safety.</p> <p>During consultations, stakeholder responses regarding the proposed number of trees for assessment in the tree felling units (3, 4 and 6 trees for the basic, intermediate and advanced unit, respectively) were mixed. While some stakeholders agreed with the proposed numbers, others expressed disagreement. The dissenting group was further divided, with some advocating for a return to the original units of competency before their 2023 release, and others suggesting a further reduction in tree numbers.</p> <p>Following a comprehensive review of all the feedback received, the Subject Matter Experts (SMEs) concluded to retain the number of trees proposed in consultations, specifically 3, 4 and 6 trees for the basic, intermediate, and advanced skill levels, respectively. These numbers represent a</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			<p>reduction of 1 and 2 trees for basic and intermediate levels from the original units before their 2023 release, with no change for the advanced level.</p> <p>This decision is 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 process (these are also explained on the project webpage). Additionally, the new User Guide has been updated with additional recommendations.</p>
Registered Training Organisation (RTO)	Victoria	<ul style="list-style-type: none"> • Expressed disagreement with the project's current approach/direction. • Stressed that tree falling is a high-risk occupation involving more than just technical skills, extending to hazard assessment. Highlighted that even minor weather changes can substantially alter risk profiles. • Detailed that the assessment process for intermediate and advanced levels is easier than for basic level. The focus at the advanced levels should be on evaluating individual's understanding of the job and their sixth sense - their ability to foresee hazards and predict outcomes. Emphasised that while the technical skills across basic, intermediate, and advanced tree fallers may not appear significantly different, it is the individual's ability to predict potential risks that sets them apart. The ultimate objective of assessment is to evaluate an 	<p>Noted. Thank you for providing this feedback.</p> <p>This project aims to facilitate a delivery issue of these units caused by the tree challenge - limited tree availability - while safety is a significant consideration.</p> <p>A critical element for achieving practical outcomes is that the resolution must balance the interests of training providers, both those affected and not affected by the tree challenge, without compromising the quality of assessment and safety.</p> <p>During consultations, stakeholder responses regarding the proposed number of trees for assessment in the tree felling units (3, 4 and 6 trees for the basic, intermediate and advanced unit, respectively) were mixed. While some stakeholders agreed with the proposed numbers, others</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<p>individual's ability for anticipating and managing various challenges.</p> <ul style="list-style-type: none"> • Voiced concerns regarding the potential legal liabilities if the number of trees used for assessments is reduced, especially in the unfortunate event of an accident following an evaluation. • Noted a particular challenge in assessing individuals at a basic level when compared to those at an advanced level, suggesting that a larger number of trees should be used to assess basic skills. This is due to the difficulty in quickly discerning the skill set of less experienced, novice operators. In contrast, the skills of advanced operators can be quickly ascertained by an assessor. • Highlighted the importance of assessing an individual's ability to evaluate surrounding conditions and potential hazards, which are critical skills in their view at all levels. • Indicated concern that reducing the number of trees used for assessment at the basic level could compromise the assessment of an individual's ability to gauge their environment and identify hazards, as limbs and other environmental factors are often the real dangers rather than falling trees themselves. • Opposed the facilitator's proposition of using an increased number of trees solely for assessing a learner's risk judgement, while limiting the 	<p>expressed disagreement. The dissenting group was further divided, with some advocating for a return to the original units of competency before their 2023 release, and others suggesting a further reduction in tree numbers.</p> <p>Following a comprehensive review of all the feedback received, the Subject Matter Experts (SMEs) concluded to retain the number of trees proposed in consultations, specifically 3, 4 and 6 trees for the basic, intermediate, and advanced skill levels, respectively. These numbers represent a reduction of 1 and 2 trees for basic and intermediate levels from the original units before their 2023 release, with no change for the advanced level.</p> <p>This decision is 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 process (these are also explained on the project webpage). Additionally, the new User Guide has been updated with additional recommendations.</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<p>demonstration of cutting skills to three trees. Reinforced the belief that assessment should involve six trees to cover the necessary scope for a thorough evaluation and that, at TAFE Gippsland, they still adhere to 6 trees for all skill levels.</p> <ul style="list-style-type: none"> • Expressed disagreement with potential changes to the assessment process and would prefer to maintain or even increase to six the number of trees required for a thorough assessment at all skill levels. Expressed concern that reducing the number of trees for assessment may lead to increased liability and a compromise in the safety and thoroughness of the assessment process. 	

17 General Comment – Risk Factor Guiding the Proposed Unit Changes/Tree Number for Assessment

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Peak Industry Body	National	<ul style="list-style-type: none"> Expressed concerns regarding the risk factors that have been associated with each tree category to reason the tree number for assessment. Emphasised the potential for high risk regardless of tree size, citing personal involvement in incidents with small trees that still posed serious dangers. 	<p>Noted. Thank you for providing these comments.</p> <p>This decision for the proposed number of trees for assessment is 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 process (these are also explained on the project webpage). Additionally, the new User Guide has been updated with additional recommendations.</p>
Registered Training Organisation (RTO)	Tasmania	<ul style="list-style-type: none"> Concurred with the sentiments previously expressed by participants, underscoring the inherent high risk associated with tree felling, regardless of the tree's size. 	<p>Noted. Thank you for providing these comments.</p> <p>This decision for the proposed number of trees for assessment is 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 process (these are also explained on the project webpage). Additionally, the new User Guide has been updated with additional recommendations.</p>

18 General Comment – Tree Challenge

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> Highlighted the challenge of identifying suitable venues for conducting assessments, emphasising this as a significant issue. 	Noted. Thank you for your contributions and support.
Government Local	New South Wales	<ul style="list-style-type: none"> Highlighted challenges faced by the Council in sourcing trees for training arborists and the feedback received from the RTO about difficulties in finding adequate trees for training. Despite understanding the safety concerns and the importance of thorough training, expressed support for a reduced number of trees in training scenarios due to practical constraints in their locality. Recognised that individuals' capabilities vary greatly, suggesting that while some may only need to be assessed on a standard number of trees, others, might require assessment on many more to ensure competency. Pointed out that the number of units set by the units of competency is the minimum standard, allowing for additional training for those who need it. The Council ensures that park workers, who may not frequently fell trees but must be qualified to do so, have their qualifications refreshed every three years. Emphasising the complexity of balancing safety with the logistical issues of training provision, 	Noted. Thank you for your contributions and support.

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		underlined commitment to not compromising on safety despite these challenges.	
Registered Training Organisation (RTO)	Tasmania	<ul style="list-style-type: none"> Noted that in Tasmania there is a sufficient supply of trees for felling/training, which may not be the case in other regions, though admitted that this observation comes from a perspective of limited experience in training. 	Noted. Thank you for your contributions and support.

19 General Comment – Pre-existing Skills

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Victoria	<ul style="list-style-type: none"> Underlined the importance of meeting prerequisites before enrolling in courses but acknowledged the challenges in formally implementing such requirements. Own practice is to conduct an informal telephone interview to assess the capabilities and experience of prospective trainees. Those unable to demonstrate sufficient skills are advised to first complete a cross-cutting course. 	Noted. Thank you for your contributions and support.

20 Other General Comment

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> Encountered trainees who failed to meet competency standards during training and assessment sessions. Noted that such individuals often choose to seek training from another RTO, where they subsequently achieve certification. 	Noted. Thank you for your contributions and support.
Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> Brought up the issue of identifying a trainee's readiness for assessment. Specifically, this pertains when a trainer should conclude that a trainee is ready for formal evaluation or make the decision to cease their training due to the improbability of them reaching the competency level required. Noted that their assessors require trainees to work on 10 to 11 different trees to build their confidence. Agreed that factors such as weather and topography can rapidly escalate the level of tree complexity from basic to intermediate level. Specifically noted that in regions like the Blue Mountains and the Southern Highlands, weather conditions can shift dramatically. This might require discontinuing training abruptly. There are situations where tomorrow's weather conditions may completely preclude any training in the same location. 	Noted. Thank you for your contributions and support.

21 Draft User Guide

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Peak Industry Body	National	<ul style="list-style-type: none"> • Expressed reservations regarding the efficiency of simulated training environments. However, suggested including the use of large tree stumps, or long/high tree stumps, as practical alternatives for practicing scarf cutting, noting that this method is not currently mentioned in the Draft User Guide. • Requested clarification about the concept of workplace-based evidence collection. Questioned whether trainees are expected to provide documentation of their previous experience in tree felling for attending a training course. Acknowledged the value of this evidence for post-training assessment but was sceptical about its practicality for pre-training, citing the risks involved in on-the-ground tree felling by individuals who may not fully comprehend proper cutting techniques despite having qualifications. Sought clarification on when and how this evidence collection is intended to be utilised. 	<p>Noted. Thank you for your comments.</p> <ul style="list-style-type: none"> • We would like to clarify that the recommendation for simulated training environments, as specified in the new User Guide, is intended for preliminary practice in chainsaw tree felling cutting techniques. The objective is to help improve efficiency in using trees. The User Guide further explains that such preliminary practice should be complemented by training practice and assessment sessions on actual trees. Please also note that we have included long/high tree stumps amongst the outlined methods outlined. • Section 6 of the New User Guide, which focusses on workplace-based evidence collection, has been revised for improved clarity. For example, first paragraph now clearly states: <i>“Industry recommends incorporating evidence of performance collected from the workplace into the assessment process for manual tree felling units. This evidence can be gathered either through direct observations by the assessor or a third-party.”</i>
Registered Training Organisation (RTO)	Victoria	<ul style="list-style-type: none"> • Emphasised that for a comprehensive assessment in forestry, individuals should physically fell all six trees under supervision. Expressed scepticism about alternative assessment methods, such as using sample stumps or photographs, emphasising the 	<p>Noted. Thank you for your comments.</p> <p>Section 6 of the New User Guide, focussing on workplace-based evidence collection, has been revised for improved clarity. It now emphasises that <i>“a judgement of competence should not be made</i></p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
		<p>importance of assessing an individual during the actual activity of felling trees.</p> <p>Use of alternative forms of evidence, such as photos or video files, could be more relevant to the Recognition of Prior Learning (RPL) process rather than direct assessment. Argued that bringing a file or similar evidence to support a candidate's experience aligns more with RPL, which evaluates a person's existing skills and knowledge, rather than with the actual assessment process during training. There is no place for such evidence in an assessment.</p>	<p><i>without some evidence that has been actively assessed or supervised by the assessor".</i></p> <p><i>Additionally, it now states that "when using a third-party to collect evidence that will contribute to a pool of assessment evidence, it is strongly recommended that this party be a suitably qualified supervisor or industry expert".</i></p>

22 Clarifications Requested

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Victoria	<ul style="list-style-type: none"> Inquired about the possibility of consulting with WorkCover (or similar authorities) to understand legal implications in the case of a serious accident, such as a fatality, which leads to a coronial inquiry; and practices applied within high-risk industries, like civil construction. 	<p>Noted. Thank you for your comments.</p> <p>SMEs have discussed at length the primary concern among those opposing the slight reduction in tree numbers, which focus on safety considerations and potential legal implications for an assessor in the event of serious injuries involving a tree felling operator. This concern stems from what is perceived as insufficient assessment evidence.</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			<p>Their considerations included the following for the proposed number of trees for assessment:</p> <p>1. Standards for Training Packages: The Standards for Training Packages require that units of competency specify the frequency and/or volume of evidence needed to assess a student's competency, in this instance, felling a certain number of trees. While no prescribed criteria exist for this in Standards, the determination of the frequency and/or volume of evidence is typically based on advice from the unit's users and the understanding that:</p> <ul style="list-style-type: none"> • Assessment criteria establish a minimum, not a maximum standard; that is, assessors may choose to evaluate competency using more trees than the prescribed number. • Assessment reflects the individual's demonstrated ability at a specific time, acknowledging that competency can change (evolve or degrade) over time. • The frequency and/or volume of evidence in the units concern solely the assessment process, without any reference to the expectations from the training process. • The units of competency from across training packages often require that the assessment

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			<p>task be done at least once, and in other cases, for several types of processes, specifically referencing high risk work licences such as forklift and scaffolding.</p> <p>2. Competency Across Varied Tree Types: Considering the diversity of tree types, particularly those with intermediate and advanced characteristics, and the limited variety of basic-level trees, SMEs supported the recommendation that the assessment criteria for each unit should specify a sufficient number of trees and this specification should encompass a range of tree types relevant to each skill level. This approach ensures that individuals can demonstrate their competency across various tree types.</p> <p>In addition, SMEs appreciated that being able to perform the task more than once might be required to demonstrate consistent competence, as success on a single occasion might not be indicative of sustained ability.</p> <p>3. Practical Analogies: SMEs emphasised the importance of extensive training practice prior to assessment, drawing a parallel to the Australia’s learner driver test model, where a learner must complete 120 hours of driving, but the actual driving test lasts no more than an hour. Further, SMEs argued that determining a candidate’s competency</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			<p>should not solely rely on a single assessment. Rather, it should encompass an evaluation of the candidate's entire learning journey and the efforts they have invested up to that point. In support, they recommended that trainees in tree felling should diligently maintain a logbook of trees. For details on this recommendation refer to the new User Guide.</p> <p>4. Legal Considerations: There are no known instances where legal opinion has been sought or could provide insight into determining the number of practical applications necessary to demonstrate competency, such as the number of trees to be felled or the number of times a machine must be loaded onto a truck.</p> <p>SMEs highlighted the importance of assessment documentation in the event of a review or legal investigation. They recommended that assessors should be able to provide sufficient evidence to demonstrate how they arrived at their decision regarding a trainee's competency, suggesting a logbook could be a useful tool for this purpose. For details on this recommendation refer to the new User Guide.</p> <p>5. Historical Context: SMEs recalled that the decision for specific tree numbers in the original units before the 2023 release was a response to inadequate training and assessment practices, particularly the</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Tasmania	<ul style="list-style-type: none"> Enquired about the possibility to include formal prerequisite units such as chainsaw units or making intermediate unit as a pre-requisite for advanced unit. Emphasised that while informal prerequisites are used, having officially mandated prerequisite unit could back up their position in discussions with customers. 	<p>'tick and flick' approach. The specific numbers were intended to enforce a level of effort from trainers/assessors and discourage substandard practices, rather than being based on any criteria for determining the minimum number of practical applications necessary for demonstrating competency.</p> <p>6. Assessor Responsibility: SMEs appreciated that assessors hold a moral responsibility to certify competency only when they are confident in an individual's abilities, especially if the engagement with the task has been minimal during the training process.</p> <hr/> <p>Noted. Thank you for bringing up the matter regarding prerequisite units.</p> <p>To clarify, the introduction of prerequisite units for tree felling learners emerged as a significant safety measure proposed by industry to ensure learners embark on their training already equipped with essential skills and knowledge to support a safe training and assessment process.</p> <p>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.</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
			<p>As an alternative, it was agreed to integrate a statement in the Application sections of both the basic, intermediate and advanced units, emphasising the value of prior experience.</p> <p>This statement reads as follows for each unit, and further explanation is provided in the new User Guide for the Tree Felling Units:</p> <p>Fell trees manually (basic): <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> <p>Fell trees manually (intermediate): <i>“Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down, maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care.”</i></p> <p>Fell trees manually (advanced): <i>“Individuals who seek to undertake this unit must have prior skills and knowledge in safely conducting intermediate tree felling operations using a chainsaw to ensure their own safety and uphold the training provider's duty of care.”</i></p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> Enquired about the possibility for prerequisite units believing strongly that there should be some sort of prerequisites for the advanced unit, at least the trim and cut unit of competency. 	<p>Noted. Thank you for bringing up the matter regarding prerequisite units.</p> <p>To clarify, the introduction of prerequisite units for tree felling learners emerged as a significant safety measure proposed by industry to ensure learners embark on their training already equipped with essential skills and knowledge to support a safe training and assessment process.</p> <p>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.</p> <p>As an alternative, it was agreed to integrate a statement in the Application sections of both the basic, intermediate and advanced units, emphasising the value of prior experience.</p> <p>This statement reads as follows for each unit, and further explanation is provided in the new User Guide for the Tree Felling Units:</p> <p>Fell trees manually (basic): <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>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Enterprise - Government Registered Training Organisation (RTO)	New South Wales	<ul style="list-style-type: none"> • Sought clarifications about the tree numbers that are subject to change in the units, confirming that they refer to the assessment only. • Noted that a significant number of trees will be necessary prior to conducting assessments to ensure that learners are trained properly. Thus, the number of trees under consideration is minimal compared to what is to be cut down. 	<p>Fell trees manually (intermediate): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely starting up, shutting down, maintaining, and performing basic operations such as trimming, cross-cutting and basic tree felling with a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Fell trees manually (advanced): <i>"Individuals who seek to undertake this unit must have prior skills and knowledge in safely conducting intermediate tree felling operations using a chainsaw to ensure their own safety and uphold the training provider's duty of care."</i></p> <p>Noted. Thanks for your comments.</p> <p>To confirm, yes, the number of trees that are subject to change in the units refer to the assessment only.</p>
Other JSCs	National	<ul style="list-style-type: none"> • Enquired about which fire land management organisations have been consulted with regarding this review. 	<p>Noted. Thanks for your query.</p> <p>We have reached out to all 127 RTOs with at least one of these units on their scope of registration. Among these, 14 have affiliations with government bodies, including departments of planning and environment, emergency services and fire authorities. In addition, ITABs and STAs have been</p>

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Other JSCs	National	<ul style="list-style-type: none"> Enquired whether the units to be released are deemed to be equivalent or non-equivalent. 	<p>engaged in this process. Furthermore, we have disseminated information about the project through the Skills Insight Stakeholder Database, which reaches a significantly wider audience of stakeholders and covers more industry sectors.</p> <p>Noted. Thanks for your query.</p> <p>There has been an update on the equivalency status within the units. Please note that the intermediate and advanced units will be deemed as not equivalent.</p>

23 Future Project Proposals for Consideration

Stakeholder Type	State	Stakeholder Feedback	Consideration and Proposed Resolution
Registered Training Organisation (RTO)	Victoria	<ul style="list-style-type: none"> Required details about the additional future projects on partnerships and virtual simulators and how they dovetail into this project, or whether they will be separate projects. 	<p>Noted. Thanks for your query.</p> <p>The additional suggestions made to contribute towards the solutions to the tree challenge faced by training providers, such as forming strategic partnerships for tree allocation and a potential use of simulator-based training (virtual reality) are outside the scope of our current project. However, stakeholder interest in participating in further discussions to progress these recommendations will be used to inform the Jobs and Skills Council (JSC) annual workforce plan, which informs future JSC activities, and may lead to additional project work to aid training delivery and support student outcomes in tree felling.</p>
Registered Training Organisation (RTO)	Tasmania	<ul style="list-style-type: none"> Noted that consistent resources and assessment materials would be a benefit 	<p>Noted. Thanks for your suggestion.</p> <p>Where feedback requests could not be implemented because they were outside the scope of this project, feedback will be carefully considered as part of the Jobs and Skills Council (JSC) annual workforce plan, which guides our decisions on future initiatives.</p>