

Draft model WHS Codes of Practice and guidance - Public Comment Response Form

Complete and submit this form by **5PM AEST FRIDAY 24 AUGUST 2012** to
codes@safeworkaustralia.gov.au

1. Cranes	
Section/page no.	Comment
4.3 high risk work licences, page 22	<p>I agree, the high risk work licences required to perform the work with cranes are set out in Schedule 3 of Regulations 2011.</p> <p>My understanding is.</p> <p>The CV licence holder does not need a dogger to sling the load, as has been stated in the Draft code page 22.</p> <p>The specific skills required are listed in TLILIC0012A Licence to operate a vehicle loading crane (capacity 10 metre tonnes and above) Page7 lists slinging techniques, Page 8 lists slinging techniques.</p> <p>Regulations2011 schedule 3 High risk work licences and classes of high risk work</p> <p>13 Vehicle loading crane with the capacity of 10metre tonnes or more, including the application of load estimation and slinging techniques to move a load.</p> <p>The regulations 2011 Dictionary says</p> <p><i>Slinging techniques means the exercising of judgment in relation to the suitability and condition of the lifting gear and the method of slinging, by consideration of the nature of the load, its mass and its centre of gravity.</i></p> <p>According to National Standards for Licencing persons performing High Risk Work (p23), the licence</p> <p><i>“covers the operation of the crane with the capacity of 10metre tonnes or more mounted on a vehicle to move a load from the vehicle, Including the application of load estimation and slinging techniques to move the load.”</i></p> <p>It is my belief, based on the above information that the statement in the Draft Code of practice Cranes page 22 4.3 is inconsitent with</p> <ul style="list-style-type: none"> • Re <p>I understand a Dogger also has to know how to apply slinging techniques.</p> <p>Unfortunately the work a Dogger does is often referred to as Dogging work. This then leads to the assumption that only Doggers can perform the skills listed.</p> <p>Regulations2011 dictionary</p>

	<p>Dogging work means</p> <p>(a) the application of slinging techniques, including the selection and inspection of lifting gear to safely sling a load</p> <p>(b) The direction of a plant operator in the movement of a load when the load is out of the operators view.</p> <p>A licenced Dogger can apply slinging techniques, and so can a Licenced Vehicle Loading Crane Operator.</p> <p>A licenced Vehicle loading crane operator cannot direct himself in the movement of the load when the load is out of his view.</p> <p>A licenced Vehicle Loading Crane Operator is not part of a crane crew.</p> <p>The licence enables him to load or unload the vehicle using the crane. He has to choose the slings chains, swift lifts, lifting bar, etc to safely lift the load off the truck.</p> <p>If he is asked to put the materials in a remote location, over a fence, up on a roof or in any location where he cannot see the load and the hook, then he requires the assistance of a licenced Dogger.</p> <p>For us in the industry to have confidence in the Code of practice Cranes, it must provide accurate information.</p>
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Impacts: Do you anticipate any potential costs or safety benefits of complying with this code that are different to current requirements in your jurisdiction? If so, what are they?

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2. Amusement Devices

Section/page no.	Comment

Impacts: Do you anticipate any potential costs or safety benefits of complying with this code that are different to current requirements in your jurisdiction? If so, what are they?

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3. Industrial Lift Trucks

Section/page no.	Comment

Impacts: Do you anticipate any potential costs or safety benefits of complying with this code that are different to current requirements in your jurisdiction? If so, what are they?

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4. Managing Risks of Plant used in Rural Workplaces

Section/page no.	Comment

Impacts: Do you anticipate any potential costs or safety benefits of complying with this code that are different to current requirements in your jurisdiction? If so, what are they?

5. Managing Security Risks in the Cash-in-transit Industry

Section/page no.	Comment

Impacts: Do you anticipate any potential costs or safety benefits of complying with this code that are different to current requirements in your jurisdiction? If so, what are they?

6. Managing Risks in Forestry Operations

Section/page no.	Comment

Impacts: Do you anticipate any potential costs or safety benefits of complying with this code that are different to current requirements in your jurisdiction? If so, what are they?

7. Guide for Tunnelling

Section/page no.	Comment

Impacts: Do you anticipate any potential costs or safety benefits of complying with this guidance material that are different to current requirements in your jurisdiction? If so, what are they?

8. Guide for Managing Risk in Cable logging

Section/page no.	Comment

Impacts: Do you anticipate any potential costs or safety benefits of complying with this guidance material that are different to current requirements in your jurisdiction? If so, what are they?