



CRANE LICENCES – TARGETED QUESTIONNAIRE FOR THE TRANSPORT AND LOGISTICS INDUSTRY

AUSTRALIAN TRUCKING ASSOCIATION SUBMISSION 10 AUGUST 2023

1. About the Australian Trucking Association

The Australian Trucking Association (ATA) is a united voice for our members on trucking issues of national importance. Together, we represent the 59,000 businesses and 200,000 people who make up the Australian trucking industry.

2. Introduction

In mid-2022, Safe Work Australia (SWA) sought evidence of any problems with crane HRW licensing and what potential solutions to those problems might look like. SWA prioritised the consideration of two issues highlighted by the public consultation – removal of crane licence encompassment and the training of crane operators in dogging. The ATA is primarily concerned with the application of the second issue to vehicle loading crane licence holders. The rest of the consultation falls outside the remit of the Association.

The targeted questionnaire asks if the vehicle loading crane licence should have a dogging licence prerequisite and what impact a dogging licence prerequisite would have if added to this licence. Our research and stakeholder engagement have evidenced that the imposition of such a requirement would be unsuitable for this licence class and would disadvantage the industry.

The ATA confirms that a dogging licence prerequisite is unsuitable for vehicle loading cranes (VLCs) and harmful to the trucking industry.

3. A dogging licence prerequisite is unsuitable for VLCs

The ATA and its members are extremely concerned by the discussion of whether the VLC licence requires a dogging prerequisite.

- VLCs are typically operated by truck drivers to unload product on the footpath or worksite beside the truck. The load never leaves the operator's sight. The ATA is not aware of any safety incidents involving VLCs and dogging.

- The addition of the prerequisite would greatly increase the cost of obtaining the licence and the duration of the training. A dogging prerequisite is simply unnecessary for the tasks undertaken by a truck driver operating in this licence class.
- A dogging prerequisite for VLCs would threaten labour supply in the trucking industry.
- Licensing is not the only aspect of safety.
- Such a change would represent a significant, unrecoverable burden on affected businesses, with no increased safety return. A RIS would demonstrate this.

The addition of the prerequisite greatly increases the cost of obtaining the licence and the duration of the training

Dogging licenses are expensive and time-consuming to obtain. The cost of a dogging license can be as high as \$1595¹, and the training can take an entire week or to complete. This can be a significant financial and time burden for operators, especially those who are only occasional users of vehicle loading cranes.

A dogging prerequisite for VLCs would threaten labour supply

Dogging licenses for VLCs could create a shortage of qualified operators. Licensing regimes often create a barrier to entry, decreasing the availability of operators, and increasing production and wage costs.² Needless licensing prevents some people from practicing their chosen trade.³ This is because many operators may not be willing to pay the cost and take the time to obtain a dogging license. This could lead to increased delays and costs for businesses that need to use vehicle loading cranes. Trucking is central to the Australian economy and labour certainty is critical in ensuring we continue to perform our role effectively.

Licensing is not the only aspect of safety

Dogging licences do not guarantee safety. While dogging licences can help to ensure that operators have the knowledge and skills necessary to safely use cranes generally, they do not guarantee that accidents will not happen. Research has demonstrated that safe crane operations also depend on good maintenance,

¹ On the Job Training <<https://onthejobtraining.edu.au/product/dogging-ticket-course-dg-licence/>> (10 August 2023).

² Senate Select Committee on Red Tape, Interim report: Effect of red tape on occupational licensing, Commonwealth of Australia, 2018, 5.

³ Ibid 16.

effective planning and supervision.⁴ Extra financial obligations on trucking companies could see maintenance funds rerouted to cover superfluous training costs.

From a transport perspective, truck mounted cranes are predominantly used to take freight off and on trucks. The load never leaves the operator's sight, and a separate licence requirement would be burdensome for this application. The ATA is unaware of any safety incidents involving VLCs and as such, there would be no safety benefit in the imposition of such a prerequisite.

⁴ Bernold *et al*, 'Intelligent Technology for Truck Crane Accident Prevention' (1997) 123(3) *Journal of Construction Engineering and Management* 276, 276.