Dogging Licence as a Primary Safety Control

What the 2024 Crane Licence Amendments Reveal About Competence on Australian Worksites.

Were you aware that many crane licences in Australia's amended WHS regulations now require a formal Dogging training as a prerequisite?

The **2024 amendments** to Australia's Model Work Health and Safety Regulations introduced a change many organisations remain unaware of: **formal dogging training is now a prerequisite for many crane licence pathways**. Once treated as an assumed or experience-based skill, competence in load assessment and lift preparation has been formally recognised as foundational to safe crane operations

What the 2024 Crane Licence Amendments Reveal About Competence on Australian Worksites

- The 2024 Crane Licence Amendments signal a shift in how crane safety competence is defined under Australia's Model Work Health and Safety Regulations.

- Long-standing licence encompassments have been removed following evidence that skills developed in one crane class do not consistently transfer to others.

- Dogging training is now a prerequisite for many crane licence pathways, under the amended Model Work Health and Safety Regulations, elevating load assessment to a core safety requirement.

- The amendments respond to persistent load-related incidents where inadequate dogging competence has been a contributing factor.

- For organisations, the changes highlight the need to review licence pathways, assumptions about transferable skills, and how dogging competence is developed and verified on site.

By removing licence encompassments and embedding dogging as a prerequisite within updated crane licence pathways, regulators have repositioned dogging as a primary safety control in high-risk lifting work. The amendments respond to recurring incidents where failures in load control were the initiating factor, reinforcing a clear message - safe crane operation starts before the crane moves.

A Persistent Safety Problem

Despite established licensing frameworks, crane-related incidents involving dropped loads, uncontrolled movement, and crush injuries continue to occur. Investigation findings consistently identify deficiencies in:

- Load assessment
- Sling selection and configuration
- Consideration of centre of gravity
- Coordination during lift preparation

These failures occur **before** crane operation begins. They arise during planning and setup, where risk is either controlled or introduced. Regulators have increasingly recognised that procedural controls alone cannot compensate for gaps in practical competence at this stage of work.

The focus of regulatory reform has therefore shifted from additional documentation to a more fundamental question: **does licensing reliably assure task-specific capability?**

Evidence Informing Regulatory Change

In 2022, **Safe Work Australia** undertook a review of the competencies required to safely operate different crane classes and perform associated tasks such as dogging and rigging. The review examined training content, licence scope, and operational exposure across multiple crane types.

Key Findings

The review identified that:

- Competence developed in slewing mobile crane training did not consistently transfer to other crane classes
- Licence encompassments had expanded over time without sufficient consideration of operational differences
- Crane licence training often included limited practical dogging exposure, despite dogging being integral to many lifts

This created a situation in which individuals could be licensed to perform work without having developed adequate practical competence for the tasks involved. Regulators identified this misalignment as a material safety risk requiring structural correction.

What the Amendments Changed

Removal of Licence Encompassment

Slewing mobile crane licence holders are no longer authorised to operate:

- Vehicle loading cranes ≥10 metre tonnes

- Non-slewing mobile cranes >3 tonnes

- Reach stackers

This change reinforces the principle that competence must be **specific to the equipment and task**, rather than inferred through licence hierarchy.

Dogging Licence as a Mandatory Prerequisite

Completion of the Licence to Perform Dogging VET course is now a formal prerequisite under the amended Model WHS Regulations before a worker can obtain most crane licences. This requirement applies across multiple high-risk crane classes, including tower cranes, portal boom cranes, non-slewing mobile cranes, and slewing mobile cranes.

By mandating dogging competency ahead of these licence pathways, the regulations firmly embed load assessment, slinging, and lift communication capability as foundational to crane operations rather than optional or experience-based add-ons. This change signals a clear regulatory expectation that safe lifting starts well before an operator is at the controls, positioning dogging competence as a core pillar of crane safety across Australian worksites.

Dogging as a Primary Safety Control

Dogging is where lift planning becomes execution. Decisions made during load assessment, including weight estimation, centre of gravity identification, sling configuration, and exclusion zone control, directly influence lift stability and predictability.

Serious incidents rarely originate from crane mechanics alone. They emerge when load-related decisions are incorrect, incomplete, or made without sufficient understanding of risk. Treating dogging as an assumed skill has historically concealed these gaps until failure occurs.

By requiring formal dogging competence before crane licensing, regulators have explicitly recognised dogging as a **primary control measure** in lifting operations, not a secondary or supporting task.

Implications for Organisations

The intent of the amendments is corrective rather than punitive.

This is an opportunity for organisations to review:

- Licence pathways and prerequisites across their workforce
- Assumptions about transferable crane skills
- How dogging competence is developed, supervised, and verified on site

When approached as part of broader safety-system improvement, these reviews can strengthen operational capability rather than simply addresses compliance requirements.

Conclusion: A Clear Signal on Safety Expectations

The 2024 Crane Licence Amendments clarify what regulators now expect: dogging competence is foundational to crane safety. By addressing long-standing gaps in licensing pathways, the amendments provide industry with a clearer benchmark for developing and verifying capability.

For organisations, the challenge is no longer understanding what the rules require, but ensuring that training, supervision, and competence assurance genuinely support safe work in high-risk lifting environments.

Supporting Industry Capability

Organisations responding to the 2024 amendments will need to ensure that dogging competence is developed in a way that reflects both regulatory intent and real-world lifting conditions.

As a provider working closely with high-risk crane operations, Kallibr Training designs dogging licence training with a strong emphasis on practical load assessment, decision-making, and site-based application. This approach supports organisations seeking to align training outcomes with contemporary safety expectations rather than relying on licence coverage alone.