

29 January 2026

Marie Bolland
Chief Executive Officer
Safe Work Australia
GPO Box 641,
Canberra, ACT 2601.
Via email: [REDACTED]

Dear Marie,

Improving the safety of earthmoving machinery used for lifting operations

Cement, Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide input into the consultation on improving the safety of earthmoving machinery used for lifting operations.

Demonstrating industry commitment to safe lifting practices

CCAA wishes to highlight that our industry has proactively identified and addressed risks associated with lifting heavy items using earthmoving machinery through the development of practical, evidence-based guidance. A key example is the [CCAA Washout Pit Gates Guideline](#), which provides detailed design and operational guidance for the safe handling and lifting of heavy washout pit gates at concrete batching plants.

Washout pit gates are substantial steel components that are routinely installed, removed and repositioned using front-end loaders or similar earthmoving machinery. CCAA recognised that, without appropriate controls, these activities present risks including crush injuries, dropped loads and uncontrolled movements. The guideline was developed to directly address these risks.

Established and robust processes already in place

The Washout Pit Gates Guideline demonstrates that CCAA and its members have robust processes aligned with the hierarchy of controls, with a strong emphasis on engineering solutions. The guideline promotes:

- Purpose-designed gate systems that allow controlled engagement and disengagement by earthmoving machinery
- Engineering features such as guides, hooks, racks and seating arrangements to prevent unintended movement
- Minimising the need for workers to be in proximity to suspended or partially supported loads
- Standardised installation, removal and maintenance practices
- Clear consideration of plant capability, load stability and operator competency

Importantly, the guideline reflects how earthmoving machinery is used in practice across the concrete industry and has been developed to improve safety outcomes without introducing unnecessary complexity or risk.

Ensuring established safe methods are recognised by SWA

CCAA seeks to ensure that the regulatory and guidance outcomes of this consultation recognise and support established, demonstrably safe industry practices, such as those outlined in the Washout Pit Gates Guideline.

In particular, CCAA encourages Safe Work Australia to ensure that any future guidance, regulatory clarification or licensing considerations:

- Acknowledge that earthmoving machinery can be used safely for specific lifting tasks where risks are well understood and effectively controlled
- Avoid unintentionally categorising well-designed, engineered lifting systems as unsafe or non-compliant
- Do not undermine existing industry guidance that has been developed to manage lifting risks responsibly
- Allow flexibility for industry-specific solutions that achieve equivalent or better safety outcomes

CCAA believes that overly prescriptive or blanket regulatory approaches could inadvertently jeopardise proven, low-risk lifting methods that are already embedded in safe systems of work across our industry.

Ongoing collaboration

CCAA remains committed to working collaboratively with Safe Work Australia and other stakeholders to improve work health and safety outcomes. We would welcome further engagement to discuss industry-developed guidance, including the Washout Pit Gates Guideline, and to contribute to the development of practical national guidance that reflects real-world operations.

For any further engagement with CCAA please contact our Director Technical Policy, Jason Kuchel at [REDACTED] or on [REDACTED]

Yours sincerely



MICHAEL KILGARIFF
Chief Executive Officer