



European Federation of Material  
Handling



**Ms Helen Marshall**

Federal Safety Commissioner  
Australian Government,  
Department of Education, Employment and Workplace relations  
Location 64N21,  
GPO Box 9879,  
Canberra ACT 2601  
Australia

**Cc:**

Mr. Alan Marshall, Chief Executive Officer - The Crane Industry Council of Australia  
Mr. Jeff Brundell, Director – Crane Safe Australia

Brussels, 07 July 2010

Dear Madam,

CECE, the Committee of European Construction Equipment and FEM, Product Group Cranes and Lifting Equipment – Tower Cranes understand that your role, as the Federal Safety Commissioner, is to promote and improve occupational health and safety in the building and construction industry.

We are also aware that as one of the largest purchasers of building and construction work nationally, the Australian Government is committed to being a model client and influencing OHS outcomes for the industry.

As you possibly know, CECE represent 1,200 companies from 12 European countries, including manufacturers of tower cranes; FEM represents more than 1,000 companies with about 160,000 employees, covering around 80% of all eligible European companies.

CECE and FEM have recently acknowledged that a brief report on the status of the Australian Standard AS 1418.4 (Cranes, hoist and winches – Part 4: Tower cranes on the cranes hoists and winches) was submitted to your kind attention.

CECE and FEM are also reliable partners of CICA, the Crane Industry Council of Australia, which has expressed its concerns and informed us of its position concerning the status and value of the current AS 1418.4 in which the normative references shall be replaced by the Australian Standard 1657 - fixed platforms, walkways, stairways and ladders.

This would have many negative consequences on our industry. In addition, this concept of “safety” will not match the world-wide harmonized interpretation of safety requirement.

**CECE aisbl**

Committee for European Construction Equipment  
President : José Luis Del Prim  
Secretary General: Ralf Wezel

Diamant Building  
Boulevard A. Reyers 80  
B-1030 Brussels  
Belgium

Phone +32 2 7 06 82-26  
Fax +32 2 7 06 82-10  
E-Mail [info@cece.eu](mailto:info@cece.eu)  
Internet : [www.cece.eu](http://www.cece.eu)

**FEM (European Federation of Material Handling)**

Postfach 71 08 64  
60498 Frankfurt/Main  
Lyoner Straße 18  
60528 Frankfurt

Phone +49 (0)69-66 03 · 1500  
Fax: +49 (0)69-66 03 · 1496  
E-mail: [Klaus.Pokorny@VDMA.org](mailto:Klaus.Pokorny@VDMA.org)  
(Secretary PG CLE)

Firstly, we wish to point out that tower cranes are considered as temporary (mobile) "machines". Hence, they shall be designed, amongst other things, for events like "wind or storm". To our knowledge, by using AS 1657:1992 the wind attack area for tower cranes would increase significantly, which is strictly forbidden as it could lead to an overstrain of the steel structure and/or reduce the safety of stability to an extent that is outside the designed limits.

Secondly, we are concerned that introducing access executions according to AS 1657:1992 would lead to Australian versions, not only for the cranes' executions but also for the cranes' configurations, e.g. hook height, corner forces, central ballast arrangements, foundation loading, etc. This will generate additional calculations on stability and might decrease the performance of the cranes.

Finally, operation manuals would not be valid any longer and cranes that are currently used today may no longer be in use.

Hence, our opinion is that in the field of tower cranes the harmonized standard EN 13586 (equivalent to ISO 11 660, which is, in turn, similar to AS 14148.4:2004) is and should remain the reference that manufacturers follow today for safe design.

We are confident that your institution will be attentive to the concerns expressed by the European manufacturers of tower cranes and will take their viewpoint into due consideration.

We remain at your disposal for a fruitful exchange on this specific topic with you and your services.

Best regards,

Best regards



Ralf Wezel  
Secretary General of CECE

Bohnenkamp  
President of FEM PG CLE - THC