



## Employer Solutions Law

### Washington Department of Labor & Industries – CR-103 Permanent Rulemaking

Washington State has enacted major new requirements governing the operation, assembly, disassembly, and reconfiguration of **tower cranes**—and the deadlines are approaching fast. Under the CR-103 Permanent Rulemaking for **WAC 296-155, Part L**, these rules take effect **December 5, 2025**, with mandatory permits required starting **January 1, 2026**.

These new requirements place substantial responsibilities on prime contractors, including permitting, inspections, documentation, and coordination with L&I and subcontractors. Contractors should act promptly to align their policies and practices with the new rule before enforcement begins.

### What Employers Need to Know

**A New Permit Is Required:** Beginning January 1, 2026, the prime contractor must obtain a permit from L&I before performing or allowing tower crane assembly, disassembly, reconfiguration, or operation.

For cranes already erected before January 1, 2026: A permit application must be submitted no later than February 1, 2026.

**Mandatory Inspections and Documentation:** The new rule requires certified component inspections by an L&I-accredited crane certifier. Contractors must maintain accessible documentation, including engineering data, prior inspection reports, and manufacturer information. Given the short timeline, employers should schedule inspections well in advance of the January–February 2026 deadlines.

**Required Safety Conferences and Notifications:** Before any permitted crane work begins, employers must conduct an L&I-defined safety conference and follow new notice and communication procedures. Documentation of these meetings will be essential in any compliance review.

## Client Advisory:

### New Tower Crane Permit Requirements Take Effect December 5, 2025

**Updated Roles, Responsibilities, and Training:** The rule formalizes several required jobsite roles, including the Assembly/Disassembly Director, Lift Director, and Site Supervisor. Employers must identify, train, and document the qualifications of individuals serving in these positions.

**Policy and Procedure Updates:** Safety manuals, job hazard analyses, lift plans, and subcontractor agreements must be updated to reflect the new rule. Employers will need to implement new processes for:

- Permit application and tracking
- Inspection scheduling and documentation
- Stop-work authority
- Coordination between the prime contractor and subcontractors

Failure to implement and document these processes may result in enforcement action.

### How difficult will this be to implement?

For **contractors who frequently use tower cranes**, implementation will be moderately to significantly time-consuming, involving:

- New administrative workflows
- Coordination with certifiers
- Revised site-safety procedures
- Training and documentation for required personnel
- Tight deadlines for permit applications

**Mid-sized contractors** should expect several weeks to a few months of preparation.

**Smaller employers** with sporadic tower-crane use may need less time—but should still begin preparing now.



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## Recommended Timeline for Compliance

To avoid delays and enforcement actions, ESL recommends the following schedule:

- **By December 1, 2025:** Complete site inventory and verify prime contractor assignments
- **By December 15, 2025:** Schedule certifier inspections and gather required documentation
- **By January 10, 2026:** Submit permit applications for all existing cranes
- **Ongoing in 2026:** Train designated personnel and review compliance procedures quarterly

## Key Take Aways

These new requirements represent a substantial shift in Washington's approach to tower-crane safety and oversight. The combination of permitting, inspections, documentation, and defined roles will require contractors to update long-standing practices and coordinate more closely with certifiers, subcontractors, and L&I. Preparing early will reduce the risk of project delays, enforcement actions, and compliance gaps as the 2026 deadlines take effect.

## Employer Solutions Law Can Assist With:

- Reviewing construction contracts for "prime contractor" responsibilities
- Updating safety manuals and job site procedures
- Preparing permit-readiness documentation
- Training supervisors and safety personnel on their new duties
- Ensuring your internal systems meet the new permit and inspection requirements

These rules carry significant compliance risks. Preparing now will help you avoid delays, citations, costly project disruptions, and potential penalties.

If you would like assistance, please contact our team. We are ready to help your business meet these new requirements with confidence.

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