

G19. In relation to recovery vehicles in the UK, what degree would a slope have to be in order to turn a pulling operation into a lifting operation?

There is **no fixed slope angle** at which a pulling operation becomes a lifting operation under UK law. The determining factor is whether the load remains supported by the ground or becomes suspended.

The Health and Safety Executive (HSE) advises that a risk assessment should be carried out to help the employer decide whether the activity is classed as pulling or lifting, before determining whether LOLER applies.

If the vehicle being recovered stays in contact with the ground, even on a steep slope, and the winch is used only to pull, the activity is considered a pulling operation and falls under the Provision and Use of Work Equipment Regulations 1998 (PUWER).

However, if any part of the load is lifted clear of the ground and suspended, even partially, the activity becomes a lifting operation under the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER). For example - a vehicle towed using a spectacle frame.

The HSE have produced some guidance on this matter. The following extract is from HSE SIM 03/2004/61 – Roadside Recovery and Repair (RRR). It was internal inspector guidance explaining how LOLER and PUWER apply to recovery operations. It is now archived with no legal status but remains a useful reference for interpreting borderline cases involving both pulling and lifting.

"15. 'Lifting equipment' used during RRR activities will have to comply with the requirements of the Lifting Operations and Lifting Equipment Regulations (LOLER). Some lifting equipment associated with recovery vehicles is very obviously subject to LOLER. However, LOLER will not normally apply to –

- 1. moveable beds and ramps.*
- 2. winches whose main purpose is dragging the casualty vehicle along the ground.*
- 3. towing dollies where the weight is supported on a small pair of wheels.*

Spectacle frames used for lifting vehicles and supporting them whilst towing, are considered to be subject to LOLER."

Further guidance on how LOLER and PUWER apply to recovery vehicles and associated equipment can be found in:

1. [HSE Guidance](#) - Roadside repair and recovery
2. [HSG 261](#) - Health and safety in motor vehicle repair and associated industries
3. PAS 43:2018 - Safe working of vehicle breakdown, recovery and removal operations
4. BS 7121-12:1999 – Safe Use of Cranes – Part 12: Recovery Vehicles and Equipment
5. BS 7901:2002 – Specification for Recovery Vehicles and Vehicle Recovery Equipment

To assist with related risk assessments, LEEA recommends referring to [FAQ M93. Is this lifting or work equipment and how should I report the results?](#), available as a free download to members.

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