

RISK CONTROL CONSULTING

Fall Protection

Beginning January 17, 2017, OSHA placed into effect the Walking-Working Surfaces and Personal Fall Protection Systems Final Rule (29 CFR Part 1910, Subpart D & I). The objective of the standard is to increase the safety and protection of general industry employees and employers from hazards associated with walking-working surfaces. OSHA estimates that the updated standard will prevent 29 fatalities and 5,842 lost work-day injuries each year. This will have a significant impact on reducing worker deaths and injuries in falls from heights and on the same level, one of the leading causes of serious work-related injuries and deaths.

Who and What the Final Rule Covers:

- Applies to all general industry workplaces and covers all walking-working surfaces
- Covers a wide variety of industries including, but not limited to, building management services, utilities, warehousing, retail, window cleaning, chimney sweeping, and outdoor advertising

Major Changes in the Final Rule:

- **Fall protection flexibility (§1910.28(b)).** Eliminates the existing mandate to use guardrails as the primary fall protection method and allows employers to choose from a range of accepted fall protection systems (includes personal fall protection systems).
- **Updated scaffold requirements (§1910.27(a)).** Requires that employers comply with OSHA's construction standards.
- **Phase-in of ladder safety systems or personal fall arrest systems on fixed ladders (§1910.28(b)(9)).** Adopts a requirement to equip fixed ladders (that extend over 24') with ladder safety or personal fall arrest systems, and prohibits the use of cages and wells as a means of fall protection over a 20-year phase-in period.
- **Phase-out of the "qualified climber" exception in outdoor advertising (§1910.28(b)(10)).** Eliminates the previous OSHA standard that qualified climbers in outdoor advertising can climb fixed ladders on billboards without fall protection and adopts the requirement to equip fixed ladders (over 24') with ladder safety or personal fall arrest systems. A "qualified climber" is defined by OSHA as an employee who, by virtue of physical capabilities, training, work experience and job assignment, is authorized by the employer to routinely climb fixed ladders, step bolts or similar climbing devices attached to structures.
- **Personal fall protection system performance and use requirements (§1910.140).** Adds requirements on the performance, inspection, use, and maintenance of personal fall protection systems and prohibits the use of body belts as a means of personal fall protection.
- **Inspection of walking-working surfaces (§1910.22(d)).** Requires employers to inspect walking-working surfaces regularly and correct, repair, or guard against hazardous conditions.
- **Training (§1910.30).** Requires employers to train workers in the use of personal fall protection systems before working in high hazard situations. Training must be delivered to employees in a manner they understand.

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Fall Protection Options:

Employers are required to protect workers from fall hazards. A fall hazard is defined as unprotected sides or edges that are at least 4 feet above a lower level. Fall protection is defined by OSHA as “any equipment, device, or system that prevents a worker from falling from an elevation or mitigates the effect of such a fall.” Employers may choose from the following fall protection systems as defined by OSHA:

- **Guardrail System** - a barrier erected along an unprotected or exposed side, edge, or other area of a walking-working surface to prevent employees from falling to a lower level.
- **Safety Net System** - a horizontal or semi-horizontal, cantilever-style barrier that uses a netting system to stop falling workers before they make contact with a lower level or obstruction.
- **Personal Fall Arrest System** - a system used to arrest an employee in a fall from a walking-working surface. It consists of a body harness, anchorage, and connector. The means of connection may include a lanyard, deceleration device, lifeline, or a suitable combination of these.
- **Positioning System** - a system of equipment and connectors that, when used with a body harness or body belt, allows an employee to be supported on an elevated vertical surface, such as a wall or window sill, and work with both hands free. Positioning systems also are called “positioning system devices” and “work-positioning equipment.”
- **Travel Restraint System** - a combination of an anchorage, anchorage connector, lanyard (or other means of connection), and body support that an employer uses to eliminate the possibility of an employee going over the edge of a walking-working surface.
- **Ladder Safety System** - a system designed to eliminate or reduce the possibility of falling from a ladder. A ladder safety system usually consists of a carrier, safety sleeve, lanyard, connectors, and body harness. Cages and wells are not ladder safety systems.

Actions to Prevent Fall Injuries:

- Organize team to evaluate fall hazards in the workplace and guard as necessary
- Reward employees for following proper fall protection procedures and identifying fall hazards in the workplace
- Guard every floor hole into which a worker can accidentally walk into
- Ensure every elevated open sided platform, floor, and runway is equipped with a guard rail and toe-board
- Provide guardrails and toe-boards on dangerous machines and equipment that workers can fall into
- Inspect jobs before they start and determine if fall protection is required i.e. safety harness and line, safety nets, stair railings, and hand rails
- Ensure that you have fall protection equipment and procedures if employees must work closer than 6 feet from the edge of roof tops. A warning line must be used 15 feet or more from the edge.
- Always equip employees with the proper fall protection to ensure the job is performed safely
- Train employees on the proper use and hazards of fall protection equipment
- Install a fall protection barrier on any loading dock higher than 4 feet
- Fall protection rules and regulations apply to all mezzanines, loading docks, roofs, and elevated surfaces 4 feet and higher and those that have been identified to pose a risk to employees
- Establish a system for the routine inspection of fall hazards and fall protection equipment

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Additional Resources:

- [OSHA Fall Protection](#)
- [Final Rule to Update General Industry Walking-Working Surfaces and Fall Protection Standards](#)

For additional information contact:

Alliant Risk Control Solution Center Toll Free Help Line: 888 737 4752.